TSD File Inventory Index

Date: <u>December 5,2000</u> Initial: <u>CM General</u>

Facility Name: Ferkel Justine	Ti	chrologies, he. Parker lider)
Facility Identification Number: ### 1057	(e 7	4 RA	
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	-	.1 Correspondence	
.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)	
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.3 Part A Application and Amendments		C.2 Compliance/Enforcement	
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	1
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A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
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A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		4 RFA Reports	
.2 Closure/Post Closure Plans, Certificates, etc ガ、チュラール、チェラ	ĺ	D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	The state of the s
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	,
B.1 Administrative Record		.4 RFI Draft /Final Report	

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Robert Budnik Regulatory Affairs Manager Henkel Surface Technologies 32100 Stephenson Highway Madison Heights, Michigan 48071

Re: Letter of Acknowledgment
Henkel Surface Technologies
U.S. EPA ID No.: MID 057 676 124

Dear Mr. Budnik:

On December 10, 1999, the United States Environmental Protection Agency (U.S. EPA) issued Henkel Surface Technologies a Notice of Violation (NOV) which identified violations of Part 111, Hazardous Waste Management, and Part 121, Liquid Industrial Wastes, of the Michigan Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended, and Subtitle C of the Federal Resource Conservation and Recovery Act of 1976 (RCRA), as amended. Specifically Michigan Administrative Code (MAC) Rule 299.9304(d) and Rule 299.9813 and Title 40 of the Code of Federal Regulations, Part 279, Section 54, (40 C.F.R. \$279.54). U.S. EPA received your January 18, 2000, response to that NOV. This letter is to inform you that U.S. EPA has reviewed your response and determined that no further enforcement action will be taken at this time.

This position does not limit your liability for compliance with all the applicable provisions of the NREPA and RCRA, as amended. Your hazardous waste management operations will continue to be evaluated by U.S. EPA and the Michigan Department of Environmental Quality in the future.

If you have any questions and/or concerns regarding this matter, please contact Ms. Diane Sharrow, of my staff, at (312)886-6199. Sincerely,

Lorna M. Jereza, P.E., Chief Compliance Section 1 Enforcement and Compliance Assurance Branch Waste, Pesticides and Toxics Division

cc: Mark Daniels, DEQ, WMD, Livonia District Office

bcc: D. Sharrow, USEPA

Section File Branch File

LEGEND: DE-9J: Sharrow: DMS: 6-6199: Houghton ack.ltr: 020400

CERTIFIED MAIL RETURN RECEIPT REQUESTED

George J. Beyer, Manager Henkel Surface Technologies 32100 Stephenson Highway Madison Heights, Michigan 48071

DE-9J

Re: NOTICE Of VIOLATION
Henkel Surface Technologies
U.S. EPA ID. NO. MID 057 676 124

Dear Mr. Beyer:

On September 21, 1999, the United States Environmental Protection Agency (U.S. EPA) and the Michigan Department of Environmental Quality (DEQ) conducted a joint Compliance Evaluation Inspection (CEI) of the Henkel Surface Technologies site located in Madison Heights, Michigan. The purpose of the CEI was to evaluate the compliance of Henkel Surface Technologies with Part 111, Hazardous Waste Management, and Part 121, Liquid Industrial Wastes, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; Subtitle C of the federal Resource Conservation and Recovery Act of 1976, as amended (RCRA); and any administrative rules or regulations promulgated pursuant to these Acts. A copy of the completed CEI checklists can be obtained by contacting Ms. Diane Sharrow at the U.S. EPA, or Mr. Mark Daniels at the DEQ.

Based on a review of the manifests and other records made available to U.S. EPA and DEQ during the CEI, the inspectors determined that Henkel Surface Technologies is a large quantity generator, because it generated over 1000 kilograms of hazardous waste in at least one month. In addition, U.S. EPA and DEQ found that Henkel Surface Technologies, Madison Heights, Michigan, had violated the following rules:

Rule 307(1) (a/k/a MAC R. 299.9307(1)) - Henkel Surface Technologies had copies of the waste analysis for the non-hazardous filter press sludge, but did not have analytical data for waste streams such as obsolete and off-specification products, ignitable waste solvents and paints from research and development, lab packs and waste water treatment heavy metal reduction precipitation. You must submit copies of your waste evaluations for the past three years.

Rules 306 (1), (1)(b), (1)(c) (a/k/a MAC R. 299.9306 (1), (1)(b),(1)(c)) - Henkel Surface Technologies does not have a permit or interim status and failed to have all containers (3 in the storage area and 2 in the satellite accumulation area) marked with: the accumulation date; the words hazardous waste; and the hazardous waste number. It was impossible to determine whether you had exceeded the 55-gallon limit in the satellite accumulation area and whether the drums had been moved to the storage area when required. In addition, it was impossible to determine if more than 90 days had elapsed since the date the containers in both areas should have been marked with an accumulation date, because the weekly inspection logs or reports for both storage areas for the past three years had not been completed or were not available. The above violations are almost identical to the violations found on February 20, 1991, when Henkel Surface Technologies was last inspected for compliance with the state and federal hazardous waste regulations. You must submit documentation that Henkel Surface Technologies is now meeting all of the conditions for an exemption to the requirement that storage can take place only under a permit or interim status, pursuant to Rule 306. You must also submit copies of the weekly inspection logs for the past three years.

Rule 306 (1)(a) (a/k/a MAC R. 299.9306 (1)(a)) [40 CFR 262.34(a)(1) and 265.171, 265.172, 265.173(a) and (b), 265.174, 265.176 and 265.177] - Henkel Surface Technologies does not have a permit or interim status. The storage area was in disarray. It was difficult to access the storage area, view the containers and read the labels. Containers were stored on and near broken pallets that hindered the inspectors' movement and access. was impossible to determine for the majority of the containers which containers held hazardous waste and which containers held non-hazardous waste, and whether the waste and containers were compatible. There was one open, unlabeled pail. There was one drum with no waste codes. There were two drums with no start There were no records of inspection for the past three Once again, the above violations are almost identical to years. the violations found on February 20, 1991, when Henkel Surface Technologies was last inspected for compliance with the state and federal hazardous waste regulations. You must submit documentation that Henkel Surface Technologies is now meeting all of the conditions for an exemption to the requirement that storage can take place only under a permit or interim status, pursuant to Rule 306 (1)(a) (which references 40 CFR 262 and 265). You must also submit copies of the weekly inspection logs for the past three years.

Rule 1003 (1) (o) (a/k/a MAC R. 299.11003(1) (o) [40 CFR 265.16] - Henkel Surface Technologies personnel training records did not contain the job titles, job descriptions and the name of each employee filling each job. Your staff indicated that all laboratory and maintenance staff are trained, but there were no specific records that listed job titles, job descriptions and the name of each employee filling the job. You must submit this documentation.

Rule 1003 (1)(o) (a/k/a MAC R. 299.11003(1)(o) [40 CFR 265.32] - Henkel Surface Technologies did not have documentation that an adequate volume of water or foam for fire control, was available. You must submit documentation that this requirement has been met.

Rule 1003 (1) (o) (a/k/a MAC R. 299.11003(1)) (o) [40 CFR 265.34(a) and (b)] - Henkel Surface Technologies did not have an internal alarm or communication device available in the satellite accumulation area. You must provide documentation that internal alarms have been installed and this violation has been corrected.

Rule 1003 (1)(o) (a/k/a MAC R. 299.11003(1)(o) [40 CFR 265.35] - Henkel Surface Technologies did not have adequate aisle space in the storage area for the unobstructed movement of personnel and emergency equipment. You must submit documentation that this has been corrected and that adequate aisle space will be maintained at all times.

Rule 1003 (1) (o) (a/k/a MAC R. 299.11003(1) (o) [40 CFR 265.37(a) and (b) and 265.53 © and (d)] - Henkel Surface Technologies had no description of arrangements made with local authorities for emergency response and services, and the Contingency Plan did not contain the addresses of the emergency coordinators. You must submit documentation of your arrangements with local authorities, and that you have included the addresses of the emergency coordinators in the Contingency Plan.

Rule 205 (a/ka/ MAC R. 299.9205) [40 CFR 273] - Henkel Surface Technologies staff were uncertain about how paint filters, electric lamps and waste devices containing mercury were characterized and managed. You must submit documentation regarding the characterization and management of these wastes.

This Notice of Violation does not preclude, nor limit, the U.S. EPA's or the DEQ's ability to initiate any other enforcement action, under Federal or State law, as deemed appropriate. Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), U.S. EPA may, among other things, issue an Order assessing a civil penalty for any past, or current, violation requiring

compliance immediately or within a specified time period. Although this letter is not such an Order, Henkel Surface Technologies should take prompt action to correct all violations and come into compliance if it has not already done so.

You are hereby requested to submit a written response, that includes the documentation listed above, to the U.S. EPA no later than 30 days from the certified receipt of this letter. The written response should document all past and current actions taken to establish compliance with the above requirements.

If you have any questions or concerns regarding this matter, please contact Ms. Sharrow, of my staff, at 312-886-6199.

Sincerely,

Lorna M. Jereza, P.E., Chief Compliance Section 1 Enforcement and Compliance Assurance Branch Waste, Pesticides and Toxics Division

cc: Mark Daniels, DEQ, WMD, Livonia District Office

bcc: Compliance File

Section File

Author

Paul Little

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST	COMPLIANCE SECTION 1 CHIEF	ECAB BRANCH CHIEF
00123/19	W. Jalog	

DE-9J:DSHARROW:12/1/99 F:\USER\DSHARROW\Henkel.NOV



FINDING NUMBER ONE (1)

- ANALYTICAL DATA (SAMPLES)
- CONTAINER WASTE APPROVAL REPORT

REPORT DATE: 12/17/99

Page 1

REPORT TIME: 8:42 am

					UNIT		
	APPROVAL #	GENERATO	R	WASTE COMMON NAME	PRICE	PER	EXP. DATE
							,
***	102324.6	HENKEL SURFACE T	rechnologies	WASTE SOLID SOAPS		Drum	7/06/00
•	2	HENKEL SURFACE T		WASTE PAINT SOLVENTS (TOLUENE/MEK)		Drum	3/29/00
	102417.6	HENKEL SURFACE T		WASTE THERMINOL 55		Drum	10/08/00
		HENKEL SURFACE I		EPOXY/ACRYLIC WASTE		DRUM	3/29/00
	/	HENKEL SURFACE T		AUTOPHORETIC 800 SERIES		MURCI	3/29/00
8e)	/	HENKEL SURFACE T		AUTOPHORETIC 800 SERIES			3/29/00
	21059098.6	HENKEL SURFACE		P3 HI-LITE 2494 CK EXP. (SETT)		PAIL	11/22/00
	•	HENKEL SURFACE		PETROL OILS/PAINT/SOLVENT (MEK/XYLENE/ACETONE)		DRUM	3/29/00
	106521.10 C	HENKEL SURFACE T		LAB PACK- FLAMMABLE LIQUIDS		DRUM	4/06/00
		HENKEL SURFACE	TECHNOLOGIES	LAB PACK- ISOCYANATE WASTE		DRUM	4/06/00
_	106521.12	HENKEL SURFACE	TECHNOLOGIES	LAB PACK NON REGULATED LIQUID/SOLID			4/08/00
	106521.17	HENKEL SURFACE	TECHNOLOGIES	LAB PACK NON RCRA REGULATED TOXIC LIQUID/SOLIDS		DRUM	4/08/00
	106521.7 C	HENKEL SURFACE	TECHNOLOGIES	LAB PACK- NON CHLORINATED FLAMMABLE LIQUID		DRUM	4/06/00
	1065218.1	HENKEL SURFACE	TECHNOLOGIES	DISCARDED OBSOLETE VIRGIN LAB CHEMICAL		PAIL	4/06/00
ί	206521B.13	HENKEL SURFACE	TECHNOLOGIES	LAB PACK WATER REACTIVE SOLIDS		PAIL	4/08/00
ç	1106521B.15	HENKEL SURFACE	TECHNOLOGIES	LAB PACK ELEMENTAL MERCURY		PAIL	4/08/00
	X06521B.16	HENKEL SURFACE	TECHNOLOGIES	LAB PACK CYANIDE SOLUTIONS		PAIL	4/08/00
,	1,06521B.6	HENKEL SURFACE	TECHNOLOGIES	LAB PACKS - OXIDIZERS		PAIL	4/06/00
	106521E.5	HENKEL SURFACE	TECHNOLOGIES	LAB PACK- RCRA TOXIC LIQUIDS/SOLIDS		DRUM	4/06/00
	06521E.8 C	HENKEL SURFACE	TECHNOLOGIES	LAB PACK- FLAMMABLE HIGH PH LIQUID		DRUM	4/06/00
•	521F.2	HENKEL SURFACE	TECHNOLOGIES	LAB PACK- HIGH PH CLEANERS		DRUM	4/06/00
i.	21F.3	HENKEL SURFACE	TECHNOLOGIES	LAB PACK- FLAMMABLE LIQUIDS		DRUM	4/06/00
	o521F.4	HENKEL SURFACE	TECHNOLOGIES	LAB PACK- LOW PH LIQUIDS		DRUM	4/05/00_
N	1065238.6	HENKEL SURFACE	TECHNOLOGIES	EPOXY RESIN, SOLID		PAIL	4/30/00
W	106529.6	HENKEL SURFACE	TECHNOLOGIES	NON-REG LIQS/SOLIDS		DRUM	4/30/00
W	1065298.6	HENKEL SURFACE	TECHNOLOGIES	NON-REG LIQS/SOLIDS		PAIL	4/30/00
N	, /106529J. <u>5</u>	HENKEL SURFACE	TECHNOLOGIES	NON-REG LIQS/SOLIDS		CUBIC YARD	4/30/00
/	106769.6	HENKEL SURFACE	TECHNOLOGIES	PETROLEUM BASED CLEANER (BENZENE)		DRUM	7/02/00
Specific Street	1067695.6	HENKEL SURFACE	TECHNOLOGIES	PETROLEUM BASED CLEANER (BENZENE)	Control of the Contro	PAIL	7/02/00
/	106770.6	HENKEL SURFACE	TECHNOLOGIES	CHROMIC ACID BASED CLEANER		DRUM	7/02/00
' J	1 06770B.6	HENKEL SURFACE	TECHNOLOGIES	CHROMIC ACID BASED CLEANER		PAIL	7/02/00
J	1.106771.6	HENKEL SURFACE	TECHNOLOGIES	VINYL POLYMER (VINYLIDENE CHLORIDE, VINYL CHLORID		DRUM	7/02/00
(196771B.6	HENKEL SURFACE	TECHNOLOGIES	VINYL POLYMER (VINYLIDENE CHLORIDE, VINYL CHLORID		PAIL	7/02/00
	106772.12	HENKEL SURFACE	TECHNOLOGIES	LAB PACK-TOXIC ORGANIC LIQUIDS		DRUM	7/02/00
	106772.13	HENKEL SURFACE	TECHNOLOGIES	LAB PACK-4,4-DIPHENYLMETHAME DIISOCYANATE		DRUM	7/02/00
•	106772.14	HENKEL SURFACE	TECHNOLOGIES	LAB PACK- TOXIC SOLIDS		DRUM	7/02/00
محكا	106772.5	HENKEL SURFACE	TECHNOLOGIES	LAB PACK-LEAN FUEL		DRUM	7/02/00
ø	106772.6	HENKEL SURFACE	TECHNOLOGIES	LAB PACK- FLAMMABLE LIQUIDS		DRUM	7/02/00 7/02/00
. 6	106772B.2	HENKEL SURFACE	TECHNOLOGIES	LAB PACK-ORGANIC PEROXIDES	(1)	DRUM	
400	/_1067729.3	HENKEL SURFACE	TECHNOLOGIES	LAB PACK-FLAMMABLE SOLID		DRUM	7/02/00 7/02/00
ď	/ 106772B.4	HENKEL SURFACE		LAB PACK-SELF HEATING SOLIDS		DRUM	7/02/00
24	1067728.7	HENKEL SURFACE		LAB PACK-ACIDIC LIQUIDS, FLAMMABLE		DRUM DRUM	7/02/00
<	/ 106772B.B	HENKEL SURFACE		LAB PACK- MERCURY THERMOMETERS		DRUM DRUM	7/02/00
	J106772B.9	HENKEL SURFACE		LAB PACK CAUSTIC LIQUID WITH LOW CONC. CYANIDE		DRUM DRUM	7/02/00
	/106772E.1	HENKEL SURFACE		LAB PACK-OXIDIZING LIQUID		DRUM	7/02/00
	/105772F.10	HENKEL SURFACE		LAB PACK-ORGANIC CAUSTICS		DRUM	7/02/00
	72F.11	HENKEL SURFACE		LAB PACK, INORGANIC ACIDIC LIQUIDS WITH Hg		DRUM	7/02/00
	. !2J.15	HENKEL SURFACE		LAB PACK-NON REGULATED LIQUIDS/SOLIDS ION EXCHANGE BEADS		DRUM ■ DRUM	7/21/00
	106793.6	HENKEL SURFACE				DRUM	7/27/00
	106828.6	HENKEL SURFACE	IECHNOLUGIES	WASTE OIL EMULSIONS			.,,00

Page 2

REPORT DATE: 12/17/99
REPORT TIME: 8:42 am

			UNIT		
APPROVAL #	GENERATOR	WASTE COMMON NAME	PRICE	PER	EXP. DATE
1.		THE STANDARY OF		DRUM	10/07/00
1107025.6	HENKEL SURFACE TECHNOLOGIES	TIN HYDROXIDE		DRUM	10/05/00
107026.6	HENKEL SURFACE TECHNOLOGIES	COMP B LOW FLASH LIQ		PAIL	10/06/00
107026B.6	HENKEL SURFACE TECHNOLOGIES	COMP B LOW FLASH LIQ		DRUM	10/06/00
√07027.6	HENKEL SURFACE TECHNOLOGIES	COMP A NEUT ORG LIQ		PAIL	10/06/00
107027B.6	HENKEL SURFACE TECHNOLOGIES	COMP A NEUT ORG LIQ	Accordings	DRUM	10/06/00
197059.4	HENKEL SURFACE TECHNOLOGIES	LAB PACK, LOW PH LIQUIDS		DRUM	10/06/00
197059.5	HENKEL SURFACE TECHNOLOGIES	LAB PACK, HIGH PH LIQUIDS		DRUM	10/06/00
1,070596.1	HENKEL SURFACE TECHNOLOGIES	LAB PACK, TOXIC LIQUIDS, ISOCYANATES AND PEST.		PAIL	10/06/00
10598.2	HENKEL SURFACE TECHNOLOGIES	LAB PACK, CHROMIC ACID SOLID		DRUM	10/06/00
7059F.3	HENKEL SURFACE TECHNOLOGIES	LAB PACK, LOW PLASH LIQUIDS			10/06/00
J07059J.6	HENKEL SURFACE TECHNOLOGIES	LAB PACK, NON REGULATED LIQUID AND SOLIDS		ONE YARD BOXES	10/06/00
√y67060B.6	HENKEL SURFACE TECHNOLOGIES	DIETHYLENETRIAMINE		PAIL	
207061B.6	HENKEL SURFACE TECHNOLOGIES	LIQUID EPOXY RESIN		PAIL	10/06/00
X07062.6	HENKEL SURFACE TECHNOLOGIES	ACRYLIC COPOLYMER		55 CALLON DRUM	10/06/00
107062B.6	HENKEL SURFACE TECHNOLOGIES	ACRYLIC COPOLYMER		PAIL	10/06/00
1070638.6	HENKEL SURFACE TECHNOLOGIES	SURFACTANTS W/BARIUM		PAIL	10/06/00
107089.6	HENKEL SURFACE TECHNOLOGIES	EPOXY/ACRYLIC WASTE (BENZENE)		DRUM	10/18/00
107091.6	HENKEL SURFACE TECHNOLOGIES	WASTE PETROLEUM OILS (VINYL CHLORIDE)		DRUM	10/19/00
1/107237.2 C	HENKEL SURFACE TECHNOLOGIES	LAB PACK NON CHLORINATED FLAMMABLE SOLVENTS		CUBIC YARD	11/22/00
107237B.10	HENKEL SURFACE TECHNOLOGIES	LAB PACK CYANIDE		PAIL	11/22/00
72378.8	HENKEL SURFACE TECHNOLOGIES	LAB PACK ELEMENTAL MERCURY		PAIL	11/22/00
- 237B.9	HENKEL SURFACE TECHNOLOGIES	LAB PACK FLAMMABLE SOLID		PAIL	11/22/00
♥ , 237E.6	HENKEL SURFACE TECHNOLOGIES	LAB PACK OXIDIZING SOLIDS		DRUM	11/22/00
A07237E.7	HENKEL SURFACE TECHNOLOGIES	LAB PACK, LOW PH LIQUIDS		CONTAINERS	11/22/05
J107237F.3 C	HENKEL SURFACE TECHNOLOGIES	LAB PACK FLAMMABLE LIQUIDS WITH AMINES, CLORINATED	4	DRUM	11/22/00
107237F.4	HENKEL SURFACE TECHNOLOGIES	LAB PACK TOXIC LIQUIDS/SOLIDS		30 GALLON DRUM	11/22/00
/107237F.5 C		LAB PACK CAUSTIC LIQUID, FLAMMABLE		30 GALLON DRUM	11/22/00
107237J.1	HENKEL SURFACE TECHNOLOGIES	LAB PACK-NON REGULATED		CUBIC YARD	11/22/00
107274B.6	HENKEL SURFACE TECHNOLOGIES	NON-CHLOR FLAMM SOLV PROD MIX (BENZENE/PETROL NAP)		DRUM	11/22/00
107275.6	HENKEL SURFACE TECHNOLOGIES	BONDERLUBE 235, 235H (SODIUM NITRITE)		•	11/22/00
107276.6	HENKEL SURFACE TECHNOLOGIES	NITRATE SOLMS (CALCIUM NITRATE/AMMONIUM NITRATE)		3	11/22/00
~					



Recertification: Y N

WASTE APPROVAL FORM

6520 GEORGIA STREET DETROIT, MICHIGAN 4821 PHONE: (313) 571-714

FAX: (313) 571-719

.proval # 102327 .6	PROVAL FORVI	Code 1390
I GENERAL INFORMATION		i i
Customer: HENKEL SURFACE TECHNOLOGIES	Generator: SAME	
Address: 32100 STEPHENSON HWY	Address: SAME	
City: MADISON HTS	City:	
State: MI Zip Code: 48071	State: Zip Code:	
Contact: D. LEMBKE	Contact: GEORGE BEYE	R (Jack Kirger)
Phone =: 2485839300 Fax: 589-4838	Phone =:	Fax:
14 tour phone ≠:	EPAID=: MID0576761	2 1
I WASTE DESCRIPTION		
Vaste Common Name: Wiste Dazut Sp.	Vents	
Specific Process Generating the Waste: ACCUMULATION		1 -0-15
	EIR SOLVENT	+ SPENT
	LIE SULVEN!	PROPURTIES
WASTE COMPOSITION must equal 100%:	ACTUAL 5	MIN. MAX.
412		30 50
EK		10 30
TRICHLORORTHINGNE ACETONE	41	
XYLENE		5 . 15
		10. 20
	, ,	S () Hexavalent Chromium (Y (S))
As defined in 40 CFR 268: Non-wastewater () Wastes	vater LIQUID	SOLID SLURRY
Sample submitted to Dynecol: Y N Color:		
III RCRA/ACT 64 WASTE CHARACTERIZATION	The second secon	
This is a hazardous waste as defined by either Michigan Act 4	51 or EPA 40 CFR 261: Yes	✓ No.
If yes, list all waste codes: For S For This is a non-hazardous waste as defined by Michigan Act 45	71. Deve Dess	Dalie
This is a non-hazardous waste as defined by Michigan Act 45	l: YesNo	
If yes, list all waste codes:	e	
This waste contains a toxicity characteristic of 40 CFR 261.24	identified as waste codes D018 thi	rough D043:
Ye No* Unknown		
If list all waste codes:		
· If based on generator knowledge, please read and understand partification in Section VI		

IV SHIPPING INFORMATION	
Waste Volume: 1 - L D UNIT: (circle one) GALLONS POU	NDS DRUMS OTHER
Shipment Frequency: (circle one) WEEK MONTH QUARTER YEA	R ONE TIME ONLY
OT Proper Shipping Hame per 49 CFR 172101: RQ, WASTE FLAMMABLE LIQUID, NO3 (1	ETHYL ETHYL KETONE
COT HAZARD Class: 3 - CM/NA Number: UN 1993 Pack	ing Group: I II Will Mone
Waste Volume: U UNIT: (circle one)	
YI GENERATOR CERTIFICATION	
	ad complete.
<u>GEORGE</u> J. BEYER	3 29 94
Vaste Volume: - U D	
Waste Volume:U_D	
Waste Volume: I CD UNT: (circle one) GALLONS POUNDS DRUMS OTHER Suppress Frequency: (circle one) WEEK MONTE QUARTER YEAR ONE TIME ONLY OT Proper Shipping Name Set 49 CFR (T.1.10): ### COMMENTS OTHERWICEASE B SATING Number: UN 19 9 3 Paciting Group: (II III Mone) VI GENERATOR CERTIFICATION OTHERWICEASE B SATING Number: UN 19 9 3 Paciting Group: (II III Mone) VI COMMENTS VI GENERATOR CERTIFICATION OTHERWICEASE B SATING Number: UN 19 9 3 Paciting Group: (II III Mone) VI COMMENTS VI GENERATOR CERTIFICATION OTHERWICEASE B SATING PROTORNING IN SUMMERS IN STREET ENGINE MAJORITHM IN SUMMERS	
WASTE ANALYSIS	
	aloas per STM346%
	a. Silver
The state of the s	
(The above items may be restricted from land disposal.) LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:	
(The above items may be restricted from land disposal.) LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS: Yes	* MSDS
(The above items may be restricted from land disposal.) LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS: Yes No Complete Partial Authorization for Dynecol to perform analysis as necessary	* MSDS
(The above items may be restricted from land disposal.) LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS: Yes No Complete Partial Authorization for Dynecol to perform analysis as necessary Purchase Order *	* MSCS
(The above items may be restricted from land disposal.) LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS: Yes No Complete Partial # Authorization for Dynecol to perform analysis as necessary Purchase Order # VIII DYNECOL USE ONLY	* MSDS
(The above items may be restricted from land disposal.) LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS: Yes No Complete Partial * Authorization for Dynecol to perform analysis as necessary Purchase Order * VIII DYNECOL USE ONLY Approval *:	:
CTE showe items may be restricted from land disposal.) LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS: Yes No Complete Purdial_ Authorization for Dynecol to perform analysis as necessary Purchase Order * VIII DYNECOL USE ONLY Approval *: [0.2.327. G	
(The above items may be restricted from land disposal.) LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS: Yes No Complete Purtial_ Authorization for Dynecol to perform analysis as necessary Purchase Order * VIII DYNECOL USE ONLY Approval *: (D.2 307. U. Treatment Facility: CMF:	- - - -

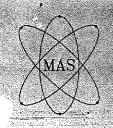


(313) 571-714]

CERTIFICATION FORM

(Submit with waste approval package)

CADEALTING CONSTITUENTS/VOL	ATILE ORGANIC COMPOUNDS (VOC)
APPROVAL NUMBER: 102327.6	EPA ID NUMBER: MIDO 57676124
GENERATOR NAME: HENKEL SURFAC	
EPA HAZARDOUS WASTE NUMBERS: 10775	FOS, FOULDOUR DOUS DOUE
MANTFEST NUMBER (IF APPLICABLE)	
PLEASE PLACE A CHECK MARK IN THE APPR	OPRLATE BOX:
THIS WASTE IS NOT PROHIBITED FROM LAND DISPOSAL	OSAL NOTE - ADDITIONAL DERTIFICATIONS MAY BE REQUIRED)
The state of the s	
THE WASTE DOES CONTAIN UNDERLYING HAZARD TREATMENT STANDARDS EXCLUDING FLUORIDE. Y THE WASTE DOES NOT CONTAIN VOLATELE ORGANI	
THE WASTE DOES CONTAIN VOLATILE DROANIC CO.	
TE: ADDITIONAL INFORMATION AS REQUIRED PER 40 CFR 168.7 GENE STRACHED DYNECOL WASTE APPROVAL FORM.	
	INED AND AM FAMILIAR WITH THE WASTE THROUGH ANALYSIS AND THAT THE INFORMATION I SUBMITTED IS TRUE, ACCURATE AND OR SUBMITTING A FALSE CERTIFICATION, INCLUDING A POSSIBILITY
	GEORGE BEYER 3/25/99
	PRINTED NAME DATE



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2727 Second Avenue
Detroit, Michigan 48201
All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only) : (313) 964-3680 Fax No: (313) 964-2339

Date

: 23-Mar-99

Client

: MOLLY DWINNELLS

: DYNECOL, INC.

Mas#

:90311037

PROJECT:

: HENKEL SURFACE TECHNOLOGIES

Sample I.D.

: 102327.6 WASTE PAINT SOLVENTS (TOLUENE/MEK)

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the sample(s) received. Midwest is not responsible data interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

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- 2. N/D=Not detected.
- 3. Results relate only to the items tested.
- 4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight)
 ppb=parts per billion, µg/l, µg/kg or µg/kg(dry weight)
- 5. QC information on file.

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

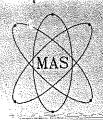
Sincerely,

Tell A

ದd Harrison

Quality Manager

ext. 111



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Detroit, Michigan 48201
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Phone: 1-800-801-4MAS (MI only) ; (313) 964-3680 Fax No: (313) 964-2339

IN: NWB

TEST REPORT

MAS #:90311037

MOLLY DWINNELLS DYNECOL, INC. 6520 GEORGIA DETROIT, MI 48211 **DATE COMPLETED:** 23-Mar-99

P.O. #: 115-4349

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 102327.6 WASTE PAINT SOLVENTS (TOLUENE/MEK)

PHYSICAL DESCRIPTION: LIQUID

Sample Date: 11-Mar-99

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	EQL	REGULATORY LIMIT	ANALYST	DATE ANALYZED	DATA FLAG
					< 140 D001	THE STATE OF THE S	03/16/99	
SW-846 1010	IGNITABILITY	98	o gr		< 140 D001	FH	03/16/99	-
SW-846 9040B	*ph / CORROSIVITY	6.55	UNITS		<2 : >12.5 D002	FH	03/12/99	
	REACTIVITY:							
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003	HL	03/15/99	
40 CFR 261.23.5	REACTIVE SULFIDE	NEGATIVE			D003	FH	03/15/99	
SW-846 9020BM	TOTAL ORGANIC HALOGENS	270	mg/kg	100		ВА	03/12/99	
~1-846 8082	PCB:		mg/kg			GM	03/18/99	
	AROCLOR 1016	N/D		1.0				
	AROCLOR 1221	N/D		1.0				
	AROCLOR 1232	N/D		1.0				
	AROCLOR 1242	N/D		1.0				
	AROCLOR 1248	N/D		1.0				
	AROCLOR 1254	N/D		1.0				
	AROCLOR 1260	N/D		1.0				
SW-846	TCLP METALS (1311):		mg/l			·MA		
6010A	ARSENIC	N/D		1.0	5.0 D004		03/18/99	
6010A	BARIUM	N/D		10	100 D005		03/18/99	
6010A	CADMIUM	N/D		0.50	1.0 D006		03/18/99	
6010A	CHROMIUM	N/D		1.0	5.0 D007		03/18/99	
6010A	LEAD	N/D	1	5.0	5.0 D008		03/18/99	
7470A	MERCURY	N/D	<u> </u>	0.10	0.2 D009		03/17/99	
6010A	SELENIUM	N/D	<u> </u>	0.50	1.0 D010		03/18/99	
6010A	SILVER	N/D		1.0	5.0 D011		03/18/99	
]	

^{*} SAMPLE PH MEASURED AT 25°C.

ZU H

. ... Harrison Quality Manager

ext. 111



6520 GEORGIA STREET DETROIT, MICHIGAN 48211 PHONE: (313) 571-7141 FAX: (313) 571-7190

1390

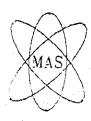
necertification: Y N Approval # 102324.6

If based on generator knowledge, please read and understand certification in Section VI

WASTE APPROVAL FORM

. 15510 / 11 /		Code	.010
I GENERAL INFORMATION			
Customer: PARKER AMXHEM	Generator: SA	AME	
Address: 32100 STEPHENSON HUY	Address: 32100		SON HWX
City: MADISON HEIGHTS	City: MADISON		
State: MT Zip Code: 45071		ode: USD	
Contact: DELURES LEMARKE		= 35yE	
Phone # (810) 553-9300 Fax(510) 559-4534	Phone #: (510) 533		
14 hour phone #:	EPA ID#: 10 0		124
II WASTE DESCRIPTION			
Waste Common Name: Waste Solid SOARS		Constitution of the second	
	ium Steazate)	rest fre	Motol
Forming	141 -100	<u> </u>	1166 (27)
TE COMPOSITION (must equal 100%):	ACTUAL %	MIN.	MAK.
5 27.100 67 - 240			
Sodium Stearate		90	- 10
Metals (Fe. Zn Ca My Li)			0.2
		-	
		1	#
		1	
CIRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTE	RISTICS OR CONTAMINA	VTS	
Carcinogen Y N Oxidizer Y N Organics W N Explo	osives Y 🦳 Phenois '	Hexavalen	t Chromium Y (N
Radioactives Y (N) Poison Y (N) PCBs Y (N) Pesti	cides Y (N)		
As defined in 40 CFR 268: Non-wastewater () Wastewate	er LIQUID	SOLID	SLURRY
Sample submitted to Dynecol: Y N Color:			
III RCRA/ACT 64 WASTE CHARACTERIZATION			4
This is a hazardous waste as defined by either Michigan Act 64 o	r EPA 40 CFR 261: Yes	N	·
If yes, list all waste codes:			`
This is a non-hazardous waste as defined by Michigan Act 136:	YesNo		
If list all waste codes:			
The vaste contains a toxicity characteristic of 40 CFR 261.24 ide	ntified as waste codes D01	8 through D043:	
Yes No* Unknown			
If was list all waste codes:			

IV SHIPPING	INFORMATIO	N				
Waste Volume: 5.	-10	UNIT: (circle one)	GALLONS	POUNDS (D	RUMS OTH	
Shipment Frequency:	(circle one)	WEEK MONTH	QUARTER	YEAR C	NE TIME CHL	*
OT Proper Shipping	Name per 49 CFR	waste la	iguib			
ettimutCass:	- MARIA CANADA MANAGAMA ANTA ANTA ANTA ANTA ANTA ANTA ANTA A	TNINA Number:		Packing Group:	I I	III Hone
Y COMMEN	15				Color The Color Color Color	- 1000gg - 1,111 - 11,00000 - 1000g
			<u> </u>			100 (100 quarter) - 100 (1
**************************************						2013-0-7
		and the second s		and the state of t		
YI GENERAT	OR CEXTIFIC	MON			A CALLED COMMENT	
				>		have the same of the same of the same
knowledge of the was	r ordaw that I per ta, and I believe	recognity have examined and that the information (suon	niced is the re-	camps and complet	مطالحسلا * عندي علمانات	A - 1
GEORG.	EJ 6	EYEN_				G , 99
	Please print or JY					T.S.
Level.	160			Sicke	12/ M	2-13/1
Ceresion Signature	A = A	MARKET MA			ite	7
VII WASTE AN	VÄLYSIS					
NIMUM ANALYT	CAL REQUERE	MENTS FOR HAZARDOUS	WASTES ARE	(All Memoes per S	74346):	
• <u>Fash a</u> E	उपयं रिक्सांप्रक	(Desection limit of 10ppm fo	or Cyanide and S	(difice)		
		201 Victor and Thailium	I and Manney	Salemnum Silver		
	<u> Ialsi</u> Americ, 3a <u> Ileialsi</u> Copper	uium, Czdmium, Chronium	, Leid, Merchy,	Seie.adiii. Siive.		
	* *	satricted from land disposal.))			
		•				
* 1200 1200 V 111						
	ATTA 2) 2.2YL	CHED FOR THE ABOVE I		Partial	MSDS	
Yes	LYSIS (S ATTA No	Complete		Partial	MSDS	
Yes Aug	LYSIS (S ATTA No			Parisl*	MSDS	
Yes Aut * Аит Рит	LYSIS (S ATTA No	Complete		Partialf	MSDS	
YesAut Pur VIII DYNECOI	NO	Complete		Partial	MSDS	
YesAut YIII DYNECOI Approval #:	LYSIS (S ATTA Nohorization for Dyn thase Order * LUSE ONLY	Completenecol to perform analysis as	necessary	Parisi	MSDS	
Yes Aut Pur VIII DYNECOI	No horization for Dyn thase Croser * USE ONLY	Completenecol to perform analysis as	necessary		MSDS	



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Phone: 1-800-801-4MAS (MI only)

: (313) 964-3680 Fax No: (313) 964-2139

Date

: 19-Jul-99

Client

: MOLLY DWINNELLS

: DYNECOL, INC.

Mas#

: 90712002

PROJECT:

: HENKEL SURFACE TECHNOLOGIES

Sample LD.

: 102324.6 WASTE SOLID SOAPS

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the samples received. Midwest is not responsible for interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

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pm=parts per million, mg/l, mg/kg or mg/kg(dry weight)

ppb=parts per billion, µg/l, µg/kg or µg/kg(dry weight)

- 5. QC information on file.
- 6. EQL=Estimated Quantitation Limit.
- 7. N/A=Not Applicable.

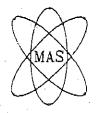
If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Charles Hindbaugh

lindbaugh Lab. Quality Menager

ext. 115



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Phone: 1-800-801-4MAS (MI only) : (313) 964-3680 Fax No: (313) 964-2339

IN: NWB

TEST REPORT

MAS#:90712002

MOLLY DWINNELLS DYNECOL, INC. 6520 GEORGIA DETROIT, MI 48211

DATE COMPLETED: 19-Jul-99

P.O. #: 115-4598

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 102324.6 WASTE SOLID SOAPS

PHYSICAL DESCRIPTION: SOLID

Sample Date: 09-Jul-99

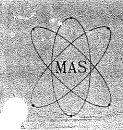
METHOD #	PARAMETER	RESULT	DNITS	FOL	REGULATORY	ANALYST	PNYTATED DAIM	DATA FLAG
9W-846 1010	IGNITABILITY	> 200	o F		< 140 D001	DD	07/16/99	<u> </u>
SW-846 9045C	*pH / CORROSIVITY	a.7a	UNITS		<2 : >12.5 E002	NW	07/13/99	
	REACTIVITY					NW	07/13/99	ļ
SW-846 7.3.3.2	REACTIVE CYANIDE	ב/א	mg/kg	5.5	250 D003		31/12/33	
40 CFR 261.23.5	REACTIVE SULFIDE	NEGATIVE		***	D003			
3W-846 9020BM	TOTAL ORGANIC MALOGENS	N/D	mg/kg	130		SK	07/13/99	
SW-846 6082	PCB:	7	mg/kg			CBR	07/13/99	
	AROCLOR 1016	N/D	1	1.0	÷	-	077_2,33	
***************************************	AROCLOR 1221	N/D	†	1.0		1		
	ARCCLOR 1232	N/D		1.0				
_	ARCCLOR 1242	N/C		<u> </u>	1			
	AROCLOR 1248	N/D	1	<u> 2.0</u>		<u> </u>		f
	AROCLOR 1254	N/E		1.0	· · · · · · · · · · · · · · · · · · ·			
	AROCLOR 1250	N/D		<u> </u>				
SW-846	TCLP METALS (1311):		mg/l			MV	07/15/99	
6010A	ARSENIC	N/D	1	1.0	S.0 D004		97/23/33	
6010A	BARIUM	N/D		10	100 Dogs			
6010A	CADMIUM	N/D		0.50	1.0 DOGE			
5010A	CHROMIUM	מ/ת		1.0	5.0 D007			
6013A	LEAD	N/D		1.0	5.0 Daca			
7470A	MERCURY	N/D	i	0.10	0.2 0009			
6010A	SELENIUM	ם/א		0.50	1.0 0010			
6010A	SILVER	מ/מ	İ	1.0	5.0 2011			

SAMPLE PH MEASURED IN WATER AT 22°C.

Charles Hindbaugh

Cooles Hindbaugh Quality Manager

ger ext. 115



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Phone: 1-800-801-4MAS (MI only) ; (313) 964-3680 Fax No: (313) 964-2339

Date : 19-Jul-99

Client : MOLLY DWINNELLS

: DYNECOL, INC.

Mas# : 90712002

PROJECT: : HENKEL SURFACE TECHNOLOGIES

Sample I.D. : 102324.6 WASTE SOLID SOAPS

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Results relate only to the items tested.

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ppb=parts per billion, µg/l, µg/kg or µg/kg(dry weight)

- 5. QC information on file.
- 6. EQL=Estimated Quantitation Limit.
- 7. N/A=Not Applicable.

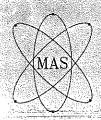
If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

harles Hindbaugh

Charles Hindbaugh
Lab. Quality Manager ext.

ext. 115²



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Phone: 1-800-801-4MAS (MI only) : (313) 964-3680 Fax No: (313) 964-2339

IN: NWB

TEST REPORT

MAS #:9 0 7 1 2 0 0 2

MOLLY DWINNELLS DYNECOL, INC. 6520 GEORGIA DETROIT, MI 48211 DATE COMPLETED: 19-Jul-99

P.O. #: 115-4598

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 102324.6 WASTE SOLID SOAPS

PHYSICAL DESCRIPTION: SOLID

Sample Date: 09-Jul-99

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	EQL	REGULATORY LIMIT	ANALYST	DATE ANALYZED	DATA FLAG
SW-846 1010	IGNITABILITY	> 200	°F		< 140 D001	DD	07/16/99	
SW-846 9045C	*pH / CORROSIVITY	8.78	UNITS		<2 : >12.5 D002	NM	07/13/99	
	REACTIVITY:					NW	07/13/99	1
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003			
40 CFR 261.23.5	REACTIVE SULFIDE	NEGATIVE			D003			
SW-846 9020BM	TOTAL ORGANIC HALOGENS	N/D	mg/kg	100		SK	07/13/99	
T-846 8082	PCB:		mg/kg			CBH	07/13/99	
	AROCLOR 1016	N/D		1.0				
	AROCLOR 1221	N/D		1.0				
	AROCLOR 1232	N/D		1.0				
	AROCLOR 1242	N/D		1.0			i i	
	AROCLOR 1248	N/D		1.0				
	AROCLOR 1254	N/D		1.0				
	AROCLOR 1260	N/D		1.0				
SW-846	TCLP METALS (1311):		mg/l			MV	07/15/99	-
6010A	ARSENIC	N/D		1.0	5.0 D004			
6010A	BARIUM	N/D		10	100 D005			
6010A	CADMIUM	N/D		0.50	1.0 D006			
5010A	CHROMIUM	N/D		1.0	5.0 D007			
5010A	LEAD	N/D		1.0	5.0 D008			
7470A	MERCURY	N/D		0.10	0.2 D009			1
6010A	SELENIUM	N/D		0.50	1.0 D010			
5010A	SILVER	N/D		1.0	5.0 D011			

^{*} SAMPLE PH MEASURED IN WATER AT 22°C.

harles Hindbaugh

...arles Hindbaugh Lab. Quality Manager

ext. 115

Same .ENKEL CORPORATI N

CHEMICALS COMMENTED TO THE SAME TO THE SAME TO THE SAME TO THE SAME
Material Safety Data Sheet $_{0}\mathcal{H}=7$

EMERGENCY PHONE: (513) 482-2297

CHEMTREC 800-424-9300

MSDS REFERENCE: EMERY 5451 (1/15/97)

SECTION I - IDENTIFICATION

WARNING! CAUSES EYE IRRITATION! AVOID CONTACT WITH EYES. WASH THOROUGHLY AFTER HANDLING.

PRODUCT: TAPG* 325 N . 4

* APG IS A REGISTERED TRADEMARK OF HENKEL CORPORATION

SYNONYMS:

ALKYL POLYGLYCOSIDE SURFACTANT

CHEMICAL: D-GLUCOPYRANOSIDE, C9-11 ALKYL, OLIGOMERIC

CAS NO: 132778-08-6

SARA HAZARD: ACUTE (SECTION 311/312)

TITLE III SECTION 313- NOT LISTED

SECTION II - INGREDIENTS AND HAZARD CLASSIFICATION

COMPOSITION

PEL/TLV

HAZARD

ALKYL POLYGLYCOSIDE (132778-08-6)

50

NONE/NONE EYE IRRITANT

WATER (7732-18-5)

AP. 50 NONE/NONE

NONE

SECTION III - HEALTH INFORMATION

INHALATION:

NO DATA AVAILABLE

INGESTION:

ACUTE ORAL LD50: > 5.0 G/KG IN MALE AND FEMALE SPRAGUE-DAWLEY

RATS.

EYE CONTACT:

0.1 ML OF PRODUCT WAS INSTILLED INTO THE EYES OF SIX RABBITS.

AFTER A 21-DAY OBSERVATION PERIOD THE MAXIMUM TOTAL EYE

IRRITATION SCORES RANGED FROM 59-78 (SCALE 0-110). THE MATERIAL PRODUCED SEVERE IRRITATION AND CORNEAL OPACITY WHICH PERSISTED

THROUGH DAY 21. NO EVIDENCE OF CORROSION WAS NOTED.

SKIN CONTACT:

THE PRIMARY SKIN IRRITATION SCORE WAS 1.2 (RABBIT) (SCALE 0-8).

THE MATERIAL WAS CLASSIFIED AS A MILD SKIN IRRITANT.

THE ACUTE DERMAL LD50 VALUE WAS GREATER THAN 2.0 G/KG IN MALE

AND FEMALE NEW ZEALAND WHITE RABBITS.

RECEIVED

MAY .0 4 1998

SECTION IV - OCCUPATIONAL EXPOSURE LIMITS

PEL: NO OSHA PEL

TLV: NO ACGIH TLV

SECTION V - EMERGENCY FIRST AID PROCEDURE

FOR OVEREXPOSURE BY SWALLOWING: CALL A PHYSICIAN OR POISON CONTROL CENTER PROMPTLY.

FOR OVEREXPOSURE BY SKIN CONTACT: IMMEDIATELY FLUSH SKIN WITH PLENTY OF WATER WHILE REMOVING CONTAMINATED CLOTHING.

FOR OVEREXPOSURE BY EYE CONTACT: IMMEDIATELY FLUSH EYES WITH PLENTY OF COOL WATER FOR AT LEAST 15 MINUTES. DO NOT LET VICTIM RUB EYES. GET MEDICAL ATTENTION IMMEDIATELY.

FOR OVEREXPOSURE BY INHALATION: IMMEDIATELY REMOVE VICTIM TO FRESH AIR. IF VICTIM HAS STOPPED BREATHING GIVE ARTIFICIAL RESPIRATION, PREFERABLY BY MOUTH-TO-MOUTH. GET MEDICAL ATTENTION IMMEDIATELY.

SECTION VI - PHYSICAL DATA

BOILING POINT: >212 DEG F

MELTING POINT: NOT DETERMINED

VAPOR PRESSURE: NOT DETERMINED

SPECIFIC GRAVITY: 1.1

VAPOR DENSITY (AIR=1): NOT DETERMINED

SOLUBILITY IN WATER: MISCIBLE

APPEARANCE AND COLOR:

CLEAR, VISCOUS, LIGHT-YELLOW LIQUID; MILD CHARACTERISTIC ODOR

SECTION VII - FIRE AND EXPLOSION HAZARDS

FLASH POINT & METHOD USED: >200 DEG F (>93 DEG C) (CLOSED CUP)

AUTO-IGNITION TEMPERATURE: NOT DETERMINED

FLAMMABLE LIMITS IN AIR, % BY VOL. LOWER: NOT DETERMINED FLAMMABLE LIMITS IN AIR, % BY VOL. UPPER: NOT DETERMINED

NFPA RATING: NO NFPA RATING

HMIS RATING: HEALTH (2) FIRE (1) REACTIVITY (0)

SPECIAL FIRE FIGHTING PROCEDURES & PRECAUTIONS

THIS PRODUCT WILL PRODUCE FOAM WHEN MIXED WITH WATER. (INDIVIDUALS SHOULD PERFORM ONLY THOSE FIRE FIGHTING PROCEDURES FOR WHICH THEY HAVE BEEN TRAINED). USE WATER SPRAY, DRY CHEMICAL, FOAM OR CARBON DIOXIDE. USE WATER TO KEEP FIRE-EXPOSED CONTAINERS COOL. IF A SPILL OR LEAK HAS NOT IGNITED, USE WATER SPRAY TO DISPERSE THE VAPORS. WATER SPRAY MAY BE USED TO FLUSH SPILLS AWAY FROM FIRE AND TO DILUTE SPILLS TO NONFLAMMABLE MIXTURES.

Henkel MSi

UNUSUAL FIRE & EXPLOSION HAZARDS

FIREFIGHTERS SHOULD WEAR SELF-CONTAINED BREATHING APPARATUS IN THE POSITIVE-PRESSURE MODE WITH A FULL FACEPIECE WHEN THERE IS A POSSIBILITY OF EXPOSURE TO SMOKE, FUMES OR HAZARDOUS DECOMPOSITION PRODUCTS.

SECTION VIII - REACTIVITY

STABILITY:

GENERALLY STABLE

HAZARDOUS POLYMERIZATION:

NONE LIKELY

CONDITIONS & MATERIALS TO AVOID:

AVOID CONTACT WITH STRONG ACIDS AND OXIDIZING AGENTS.

HAZARDOUS DECOMPOSITION PRODUCTS:

DECOMPOSITION MAY PRODUCE CARBON MONOXIDE AND CARBON DIOXIDE.

SECTION IX - EMPLOYEE PROTECTION

CONTROL MEASURES:

HANDLE IN THE PRESENCE OF ADEQUATE VENTILATION.

RESPIRATORY PROTECTION:

RECOMMENDED EXPOSURE LIMITS (i.e., OSHA-PEL AND ACGIH-TLV) HAVE NOT BEEN ESTABLISHED FOR THIS MATERIAL. WHETHER THERE IS A NEED FOR RESPIRATORY PROTECTION UNDER YOUR CONDITIONS OF HANDLING OF THIS MATERIAL SHOULD BE EVALUATED BY A QUALIFIED HEALTH SPECIALIST.

PROTECTIVE CLOTHING:

WEAR GLOVES AND PROTECTIVE CLOTHING WHICH ARE IMPERVIOUS TO THE PRODUCT FOR THE DURATION OF ANTICIPATED EXPOSURE IF THERE IS POTENTIAL FOR PROLONGED OR REPEATED SKIN CONTACT.

EYE PROTECTION:

WEAR SAFETY GLASSES MEETING THE SPECIFICATIONS OF ANSI STANDARD Z87.1 WHERE NO CONTACT WITH THE EYE IS ANTICIPATED. CHEMICAL SAFETY GOGGLES MEETING THE SPECIFICATIONS OF ANSI STANDARD Z87.1 SHOULD BE WORN WHENEVER THERE IS THE POSSIBILITY OF SPLASHING OR OTHER CONTACT WITH THE EYES.

SECTION X - ENVIRONMENTAL PROTECTION

ENVIRONMENTAL PRECAUTIONS:

AVOID UNCONTROLLED RELEASES OF THIS MATERIAL. WHERE SPILLS ARE POSSIBLE, A COMPREHENSIVE SPILL RESPONSE PLAN SHOULD BE DEVELOPED AND IMPLEMENTED.

SPILL OR LEAK PRECAUTIONS:

WEAR APPROPRIATE RESPIRATORY PROTECTION AND PROTECTIVE CLOTHING AS DESCRIBED IN SECTION IX. CONTAIN SPILLED MATERIAL. TRANSFER TO SECURE CONTAINERS. WHERE NECESSARY, COLLECT USING ABSORBENT MEDIA. IN THE EVENT OF AN UNCONTROLLED RELEASE OF THIS MATERIAL, THE USER SHOULD DETERMINE IF THE RELEASE IS REPORTABLE UNDER APPLICABLE LAWS AND REGULATIONS.

WASTE DISPOSAL:

ALL RECOVERED MATERIAL SHOULD BE PACKAGED, LABELED, TRANSPORTED, AND DISPOSED OR RECLAIMED IN CONFORMANCE WITH APPLICABLE LAWS AND REGULATIONS AND IN CONFORMANCE WITH GOOD ENGINEERING PRACTICES. AVOID LANDFILLING OF LIQUIDS. RECLAIM WHERE POSSIBLE.

SECTION XI - REGULATORY CONTROLS

DEPARTMENT OF TRANSPORTATION:

DOT CLASSIFICATION: NOT REGULATED

DOT PROPER SHIPPING NAME:

OTHER DOT INFORMATION:

OTHER REGULATORY REQUIREMENTS:

LISTED IN TSCA INVENTORY

CERCLA HAZARDOUS MATERIALS:

NONE NOTED

SECTION XII - PRECAUTIONS: HANDLING, STORAGE AND USAGE

SPILLED MATERIAL MAY BE SLIPPERY. CLEAN UP SPILLS IMMEDIATELY BEFORE WALKING IN SPILL AREA.

The information presented herein is believed to be factual as it has been derived from the works and opinions of persons believed to be qualified experts; however, nothing contained in this information is to be taken as a warranty or representation for which Henkel Corporation bears legal responsibility. The user should review any recommendations in the specific context of the intended use to determine whether they are appropriate.

PREPARED BY: ROBERT E. BORGERDING

DATE: 1/15/97 SUPERSEDES:

Henkel Corporation, Chemicals Group 4900 Este Avenue Cincinnati, Ohio 45232

WHITE TO YELLOW CRYSTALLINE POWDER AND CHUNKS PHYSICAL PROPERTIES 54 C TO 56 C MELTING POINT: 177 F FLASHPOINT 80C SECTION 10. - - - - - - - - STABILITY AND REACTIVITY - - - - - -INCOMPATIBILITIES STRONG OXIDIZING AGENTS HAZARDOUS COMBUSTION OR DECOMPOSITION PRODUCTS TOXIC FUMES OF: CARBON MONOXIDE, CARBON DIOXIDE NITROGEN OXIDES SECTION 11. - - - - - - TOXICOLOGICAL INFORMATION - - - - - -ACUTE EFFECTS MAY BE HARMFUL BY INHALATION, INGESTION, OR SKIN ABSORPTION. MAY CAUSE EYE IRRITATION. MAY CAUSE SKIN IRRITATION. TO THE BEST OF OUR KNOWLEDGE, THE CHEMICAL, PHYSICAL, AND TOXICOLOGICAL PROPERTIES HAVE NOT BEEN THOROUGHLY INVESTIGATED. SECTION 12. - - - - - - ECOLOGICAL INFORMATION - - - - - - -DATA NOT YET AVAILABLE. SECTION 13. - - - - - - DISPOSAL CONSIDERATIONS - - - - - - -THIS COMBUSTIBLE MATERIAL MAY BE BURNED IN A CHEMICAL INCINERATOR EQUIPPED WITH AN AFTERBURNER AND SCRUBBER. OBSERVE ALL FEDERAL, STATE AND LOCAL ENVIRONMENTAL REGULATIONS. SECTION 14. - - - - - - - TRANSPORT INFORMATION - - - - - -CONTACT ALDRICH CHEMICAL COMPANY FOR TRANSPORTATION INFORMATION. SECTION 15. - - - - - - - REGULATORY INFORMATION - - - - - - - - -DATA NOT AVAILABLE SECTION 16. - - - - - - - - OTHER INFORMATION- - - - - - - - -THE ABOVE INFORMATION IS BELIEVED TO BE CORRECT BUT DOES NOT PURPORT TO BE ALL INCLUSIVE AND SHALL BE USED ONLY AS A GUIDE. SIGMA, ALDRICH, FLUKA SHALL NOT BE HELD LIABLE FOR ANY DAMAGE RESULTING FROM HANDLING OR FROM CONTACT WITH THE ABOVE PRODUCT. SEE REVERSE SIDE OF INVOICE OR PACKING SLIP FOR ADDITIONAL TERMS AND CONDITIONS OF SALE. COPYRIGHT 1998 SIGMA-ALDRICH CO. LICENSE GRANTED TO MAKE UNLIMITED PAPER COPIES FOR INTERNAL USE ONLY

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HMH-521 PH=5-7

MATERIAL SAFETY DATA SHEET

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! CIBA-GEIGY CORPORATION PIGMENTS DIVISION 315 WATER STREET NEWPORT, DE 19804 (800) 355-CIBA, OR -2422 OR ! ! DIRECT: (302) 633-2060, OR -2061!

! EMERGENCY PHONE NUMBER:

(800) 888-8372

SECTION I-IDENTITY INFORMATION _____

IDENTITY (TRADENAME): UNISPERSE GREEN G-EN

FAMILY/CHEMICAL NAME:

COPPER PHTHALOCYANINE

C.I PIGMENT GREEN 7

C.I. NO. 74260

PRODUCT TYPE:

AQUEOUS PIGMENT DISPERSION.

HAZARD STATEMENT :

THIS MATERIAL SAFETY DATA SHEET (MSDS) HAS BEEN

* PREPARED IN COMPLIANCE WITH THE FEDERAL OSHA HAZARD

* COMMUNICATION STANDARD 29 CFR 1910.1200.

THIS PRODUCT IS CONSIDERED TO BE A HAZARDOUS

CHEMICAL UNDER THAT STANDARD.

__ SECTION II-HAZARDOUS INGREDIENTS _

SPECIFIC CHEMICAL NAME:

PROPRIETARY EYE IRRITANT

CAS #: PROPRIETARY

COMMON NAME: PROPRIETARY

EXPOSURE LIMITS:

OSHA PEL: NOT ESTABLISHED ACGIH TLV: NOT ESTABLISHED

CARCINOGENICITY:

THIS CHEMICAL HAS NOT BEEN REVIEWED FOR CARCINOGEN-

ICITY BY NTP, IARC, OR OSHA.

SECTION III-PHYSICAL DATA APPEARANCE AND ODOR: GREEN LIQUID, ODORLESS BOILING POINT: 100C PREEZING POINT: < 0C DECOMPOSITION TEMPERATURE: >200C. SOLUBILITY IN WATER: MISCIBLE SPECIFIC GRAVITY: 1.3 G/CM3 SECTION IV-FIRE AND EXPLOSION HAZARD DATA FLASH POINT: NOT APPLICABLE. FLAMMABLE LIMITS IN AIR-LOWER: NOT APPLICABLE. FLAMMABLE LIMITS IN AIR-UPPER: NOT APPLICABLE. EXTINGUISHING MEDIA: CARBON DIOXIDE, DRY CHEMICAL, FOAM, WATER. FIRE FIGHTING PROCEDURES-SPECIAL: USE SELF-CONTAINED BREATHING APPARATUS. UNUSUAL FIRE AND EXPLOSION HAZARDS: DECOMPOSITION AND COMBUSTION PRODUCTS MAY BE TOXIC. SECTION V-REACTIVITY DATA STABILITY: STABLE. CONDITIONS TO AVOID: SENSITIVE TO TEMPERATURES BELOW -10C (+14F). AVOID TEMPERA-TURES ABOVE 60C (140F). HAZARDOUS POLYMERIZATION: WILL NOT OCCUR. SECTION VI-HEALTH HAZARD DATA PRIMARY ROUTES OF EXPOSURE: DERMAL, INHALATION. OVEREXPOSURE EFFECTS: PRODUCT CONTAINS GREATER THAN 1% OF AN INGREDIENT FOUND TO BE AN EYE IRRITANT. THE PRESERVATIVE IN THIS PRODUCT IS A SKIN SENSITIZER. THOUGH IT IS PRESENT AT A CONCENTRATION LESS THAN 1%, INDIV-IDUALS ALREADY SENSITIZED TO THIS BENZISOTHIAZOLINONE -CONTAINING PRESERVATIVE SHOULD EXERCISE CARE IN HANDLING. MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE:

SEE OVEREXPOSURE EFFECTS.

EMERGENCY AND FIRST AID PROCEDURES-EYES:

FOR EYE CONTACT, FLUSH EYES WITH PLENTY OF WATER FOR SEVERAL MINUTES. GET MEDICAL ATTENTION IF IRRITATION OCCURS.

EMERGENCY AND FIRST AID PROCEDURES-SKIN:

FOR SKIN CONTACT, WASH AFFECTED AREAS WITH PLENTY OF WATER, AND SOAP, IF AVAILABLE, FOR SEVERAL MINUTES. GET MEDICAL ATTENTION IF IRRITATION OCCURS.

EMERGENCY AND FIRST AID PROCEDURES-INGESTION:

IF SWALLOWED, GIVE AT LEAST 3-4 GLASSES OF WATER BUT DO NOT INDUCE VOMITING. DO NOT GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSING PERSON.

EMERGENCY AND FIRST AID PROCEDURES-INHALATION:

IF INHALED, REMOVE FROM AREA TO FRESH AIR. GET MEDICAL

ATTENTION IF RESPIRATORY IRRITATION DEVELOPS OR IF BREATHING
BECOMES DIFFICULT.

SECTION VII-SPILL OR LEAK PROCEDURES
SPILL PROCEDURES: WEAR PROTECTIVE CLOTHING SPECIFIED BELOW. ISOLATE SPILL AREA. ABSORB ONTO SAND OR OTHER ABSORBENT MATERIAL. SHOVEL INTO CLOSABLE CONTAINER FOR DISPOSAL. WASTE DISPOSAL METHODS: DISPOSE IN ACCORDANCE WITH FEDERAL, STATE AND LOCAL REGULATIONS.
SECTION VIII-SPECIAL PROTECTION INFORMATION
VENTILATION: WORK IN WELL VENTILATED AREAS. DO NOT BREATHE MISTS OR VAPORS. PROTECTIVE GLOVES: AS WITH ANY INDUSTRIAL CHEMICAL, UNNECESSARY SKIN CONTACT SHOULD BE AVOIDED. IMPERVIOUS GLOVES RECOMMENDED.

EYE PROTECTION: WEAR SAFETY GLASSES OR GOGGLES.

RESPIRATORY PROTECTION:

USE NIOSH RESPIRATORS AS NEEDED TO MITIGATE EXPOSURE.

 SECTION	IX-SPECIAL	PRECAUTIONS	

HANDLING, SHIPPING AND STORING PRECAUTIONS:

WARNING! EYE IRRITANT.

AVOID CONTACT WITH EYES, SKIN AND CLOTHING. AVOID BREATHING DUST, MIST OR VAPORS. USE ONLY WITH ADEQUATE VENTILATION. WASH HANDS AND FACE THOROUGHLY BEFORE EATING, DRINKING, OR USING TOBACCO PRODUCTS.

KEEP ABOVE 32F. KEEP CONTAINER CLOSED WHEN NOT IN USE. FOR INDUSTRIAL USE ONLY.

	SECTION	X-	REGULATORY	INFORMATION	
--	---------	----	------------	-------------	--

TRANSPORTATION:

NOT REGULATED.

SARA/TITLE III - TOXIC CHEMICALS LIST:

THIS PRODUCT DOES NOT CONTAIN A TOXIC CHEMICAL FOR ROUTINE ANNUAL 'TOXIC CHEMICAL RELEASE REPORTING' UNDER SEC. 313 (40 CFR 372).

TSCA INVENTORY STATUS:

ALL CHEMICAL COMPONENTS ARE LISTED ON THE TSCA INVENTORY. PENNSYLVANIA RIGHT-TO-KNOW ACT:

THE FOLLOWING IS REQUIRED COMPOSITION INFORMATION.

CHEMICAL NAME : C.I. PIGMENT GREEN 7

CAS NUMBER : 1328-53-6

COMMENTS : ENVIRONMENTAL HAZARD. * * *

CHEMICAL NAME: SPECIFIC CHEMICAL IDENTITY OF THIS COMPONENT

IS BEING WITHHELD AS TRADE SECRET.

GENERIC NAME : SURFACTANT

COMMENTS: NOT ON PENNSYLVANIA HAZARDOUS SUBSTANCE LIST.

* * *

CHEMICAL NAME: 1,2-PROPANEDIOL

CAS NUMBER : 57-55-6

COMMON NAME : 1,2-PROPYLENE GLYCOL COMMENTS : HAZARDOUS SUBSTANCE.

CHEMICAL NAME : WATER CAS NUMBER : 7732-18-5

COMMON NAME : WATER

COMMENTS : NOT ON PENNSYLVANIA HAZARDOUS SUBSTANCE LIST.

PLEASE NOTE:

- OUR PRODUCTS ARE INTENDED FOR INDUSTRIAL USE ONLY ! THIS -

- MATERIAL IS NOT INTENDED FOR USE IN PRODUCTS FOR WHICH
- PROLONGED CONTACT WITH MUCOUS MEMBRANES OR ABRADED SKIN -
- OR IMPLANTATION WITHIN THE HUMAN BODY IS SPECIFICALLY
- INTENDED. CIBA-GEIGY CORPORATION IS NOT ABLE TO RECOM-
- MEND THIS MATERIAL AS SAFE AND EFFECTIVE FOR SUCH USES
- AND ASSUMES NO LIABILITY FOR SUCH USE.

ISSUE DATE: EVISION: 05C FOR FURTHER INFORMATION, PLEASE CONTACT: DR. EVA M. VARY

THE INFORMATION AND RECOMMENDATIONS CONTAINED HEREIN ARE BASED UPON DATA BELIEVED TO BE CORRECT. HOWEVER, NO GUARANTEE OR WARRANTY OF ANY KIND EXPRESSED OR IMPLIED IS MADE WITH RESPECT TO THE INFORMATION CONTAINED HEREIN.



necertification: Y N

DYNECOL, INC

5520 GEORGIA STREE DETROIT, MICHIGAN 482.

PHONE: (313) 571.714

WASTE APPROVAL

Acoroval # 102324 6	ROVAL FORM	er e	44: (325) 573-7.
		Code	1390
GENERAL INFORMATION			<u> </u>
Customer: PARKER AMCHEM	Generator:	***************************************	
Address 32100 STEPHENSON HILLY	Address: 32100 ST		
-17 MADISON HEIGHTS	City: MADISON -	EHENSO	<u>:ルールメ</u>
21p Code: 45071	State: VI Zip Code:		The company of the co
Contact: DELUZES LEMBE	C		
Phone 我 SIC) 553-9360 Fax(510) 559-4534:	Phone # (\$10)553 - 730	<u> 3=y=2</u>	
24 hour phone #:	EPAID# MID UST		
II WASTE DESCRIPTION	<u> </u>	<u> </u>	
Waste Common Name: Waste Solid Soans			
The Process Consessed in the Process Consessed			
FORMING.	ium Steagate) used	YOR MO	12
STE COMPOSITION (must equal 100%);	ACTUAL TO		(A
sodium Steazate		MIN.	MAIK.
Water	-	5	10
Metale (Fi. En. C. My (i)		90 .	<u>95</u>
		-	
	The state of the s		
IRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTER	ISTICE OF CONTRACTOR		
adipactives Y (X) points	sives Y/N Phenois $Y(N)$ F	iexavalent Chron	nium y (N)
Pestici	des Y N		
The state of the s	LIQUID 50	LID S	LURRY
mple submitted to Dynecol: Y N Color:			
RCRA/ACT 64 WASTE CHARACTERIZATION			
is is a hazardous waste as defined by either Michigan Act 64 or	EPA 40 CFR 261: Yes	No	
yes, list all waste codes:	***************************************		!
is is a non-hazardous waste as defined by Michigan Act 136:	Yes No		
yes, list all waste codes:	170	. • .	!
aste contains a toxicity characteristic of 40 CFR 261.24 identi	1,00		
No* Unknown	nied as waste codes D018 through	D043:	
res, list all waste codes:			
based on generator knowledge, please read and understand certification in Section VI			

	·
IY SHIPPING INFORMATION	_
Waste Volume: 5 - 10 UNIT: (circle one) GALLONS	POUNDS DRUMS OTHER
Shipment Frequency: (circle one) WEEK MONTH QUARTER	YEAR ONE TIME ONLY
OCT Proper Shipping Hame per 49 CFR 172:101:	
won- was waste liquid	
20 Hand Case 2000 Named:	Packing Group: I II III (None
V COMMENTS	

YI GENERATOR CERTIFICATION	
I certify under penalty of law that I personally have examined and am familiar w	rich the waste through analysis and lesting or through
knowledge of the waste, and I believe that the information I momitted is true, to	cante are complete.
GEORGE J. BEYER	7 . 6 . 95
Generator Manne Please print or type)	See .
Dery Beyer	Signise parasel
Generator Signature	. He
II WASTE ANALYSIS	
MINIMUM ANALYTICAL REQUIREMENTS FOR HAZARDOUS WASTES ARE	(All Medocs for SW346);
· Fish 16 and Received (Detection limit of Dopon for Cyanide and S	ui(ide)
PERS SHOCs (Method 9020) Victor and Trailium	
Mission Assenie, Banum, Comium, Chromium, Lead, Mercury,	Scientum, Silver
Michigan metals: Copper and Zinc	
(The above limins may be restricted from land dispessi.)	
ABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:	
	retial MSDS
Allinormation for Dynessel to perform analysis as necessary	
Purchase Order #	
VIII DYNECOL USE ONLY	
Approval #: 102324.6	
reament Facility: CMF:	
Approved by: (8)	Date:
Expiration date: 7/6/00	



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Phone: 1-800-801-4MAS (MI only)

: (313) 964-3680

Fax No: (313) 964-2339

Date

: 19-Jul-99

Client

: MOLLY DWINNELLS

: DYNECOL, INC.

Mas#

: 90712002

PROJECT:

: HENKEL SURFACE TECHNOLOGIES

Sample I.D.

: 102324.6 WASTE SOLID SOAPS

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services. Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the samples received. Midwest is not responsible for interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

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- 2. N/D=Not detected.
- 3. Results relate only to the items tested.
- 4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight) ppb=parts per billion, µg/l, µg/kg or µg/kg(dry weight)
- 5. QC information on file.
- 6. EOL=Estimated Quantitation Limit.
- 7. N/A=Not Applicable.

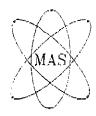
If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Charles Hindleugh

Charles Hindbaugh
Lab. Quality Menager

ext. 115



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IN: NWB

TEST REPORT

MAS #:90712002

MOLLY DWINNELLS DYNECOL, INC. 6520 GEORGIA **DETROIT, MI 48211**

DATE COMPLETED: 19-Jul-99 P.O. #: 115-4598

PROJECT: HENKEL SURFACE TECHNOLOGIES SAMPLE IDENTIFICATION: 102324,6 WASTE SOLID SOAPS

PHYSICAL DESCRIPTION: SOLID

Sample Date: 09-Jul-99

method #	PARAMETER	SAMPLE RESULT	UNITS	EQL	REGULATORY LIMIT	Analyst	DATE ANALYZED	DATA FLAG
SW-846 1010	IGNITABILITY	> 200	qo q		< 140 D001	DD	07/16/99	
SW-846 9045C	*pH / CORROSIVITY	8.78	UNITS		<2 : >12.5 D002	NW	07/13/99	
<u></u>	REACTIVITY:		<u> </u>			NW	07/13/99	┼
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003			
40 CFR 261.23.5	REACTIVE SULFIDE	NEGATIVE			D003			
SW-846 9020BM	TOTAL ORGANIC HALOGENS	N/D	mg/kg	100	~ PT - A-	sk	07/13/99	
5W-846 8082	PCB;	 	mg/kg			СВН	07/13/99	
	AROCLOR 1016	N/D		1.0			1 , 1 , 1 , 1 , 1	·
	AROCLOR 1221	N/D		1.0				
	AROCLOR 1232	N/D	*************	1.0				
	AROCLOR 1242	N/D	_	1.0				
+ · · · · · · · · · · · · · · · · · · ·	AROCLOR 1248	N/D	1	1.0				
	AROCLOR 1254	N/D		1.0				
	AROCLOR 1260	N/D		1.0				
SW-846	TCLP METALS (1311):		mq/l			MV	07/15/99	<u> </u>
6010A	ARSENIC	N/D		1.0	5.0 D004			
6010A	BARIUM	N/D		10	100 D005			
6010A	CADMIUM	N/D		0,50	1.0 D006			
6010A	CHROMIUM	N/D		1.0	5.0 D007			
6010A	LEAD	N/D		1.0	5.0 D008	<u> </u>		
7470A	MERCURY	N/D		0.10	0.2 D009			
6010A	SELENIUM	N/D		0.50	1.0 D010			
60101	SILVER	N/D		1.0	5.0 D011			

* SAMPLE PH MEASURED IN WATER AT 22°C.

harles Hindlang

Charles Hindbaugh Lab. Quality Manager ext. 115



tecertification: (Y) N Approval # 102324

WASTE APPROVAL FORM

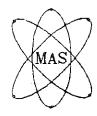
6520 GEORGIA STREET DETROIT, MICHIGAN 48211

PHONE: (313) 571-71-1 FAX: (313) 571-7190

1390 Code

I GENERAL INFORMATION			
Customer: PARKER AMCHEM	Generator: SAME		
Address: 32100 STEPHENSON HWY		EPHENSON	
City: MADISON HEIGHTS		EIGHTS	HWX
State: MT Zip Code: 48071	State: MI Zip Code:	<u> 4</u> 8071	***
CONTACT: DELODES LEAABKE	Contact: GEORGE	BEYER	
Phone #(810) 553-9300 Fax(510) 589-4534	Phone #: (810) = 33 - 93	COFax:	
24 hour phone #:	EPAID#: MID C57		
II WASTE DESCRIPTION			<u></u>
Wasie Common Name: Waste Solid Soaps			WHITE -
Specific Process Generating the Waste: Lubricant (Sod			1
Forming ENORICHITE (SU)	hun Steaeste usid	tor meta	
		-	, and the second
STE COMPOSITION (must equal 100%):	ACTUAL &	MIN.	MAX.
		.*1.1.	. * 4 , ~ 2 . 4 .
Sodium Stenante	**************************************		10
Metals (F. En. (Mali)		<u> 90</u>	95
			<u> </u>
CIRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTE Carcinogen Y (N) Oxidizer Y (N) Organics Y (N) Pesti Radioactives Y (N) Poison Y (N) PCBs Y (N) Pesti	osives Y / N Phenols $Y (N)$	Hexavalent Chromit	am Y N
As defined in 40 CFR 268: (X) Non-wastewater () Wastewate	er LIQUID S	SOLID (SL	URRY
Sample submitted to Dynecol: Y N Color:			
III RCRA/ACT 64 WASTE CHARACTERIZATION			VIII
This is a hazardous waste as defined by either Michigan Act 64 o	г EPA 40 CFR 261: Yes	No X	
If yes, list all waste codes:		- 110	
This is a non-hazardous waste as defined by Michigan Act 136:	Yes No		
I list all waste codes:			
raste contains a toxicity characteristic of 40 CFR 261.24 ide	ntified as waste codes D018 throu	igh D043:	
les No* Unknown		g	i
f yes, list all waste codes:	way was to the same of the sam		
If based on seneralor knowledge please and and understand again and and and and and and are in the series and			

IV SHIPPING INFORMATI	ON			· · · · · · · · · · · · · · · · · · ·		
Waste Volume: 2-6	UNIT: (circle one)	GALLONS	POUNDS	2012.6		
hipment Frequency: (circle one)	WEEK MONTH	QUARTER	YEAR	ONE TIME	OTHER_	
DOT Proper Shipping Name per 49 CF	R 172.101:			ONE TIME	CHL	
Y COMMENTS	CM/MA Number: No	we.	Packing Groo	ם ו : פו	Ц	None
VI GENERATOR CERTIFICA	NOITA					,
certify under penalty of law that I pen inowledge of the waste, and I believe to GEORGE J. B. Generator Name (Please print or type electron Signature)	EYER.	am familiar with ted is true, accu	tibe waste three trace and comp.	ough malysis lete.	Dete Standy	er through
WASTE ANALYSIS TIMUM ANALYTICAL REQUIREME Flash pH and Reserves (To PCBs SHOCs Method 2020 TCLP metals: Arsenic, Baring Michigan metals: Copper and (The above items may be resu	etection limit of 20ppm for 0 1. Nickel and Thallium um, Cadmium, Chromium, Le d Zinc	Tyanide and Solfi	ice)	S7/846):		
ABORATORY ANALYSIS IS ATTACH No	ED FOR THE ABOVE ITEN	Parti:	al	MSD	25	
II DYNECOL USE ONLY						
	102324.	,				



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Date

: 26-Jun-97

Client

: MOLLY DWINNELLS

: DYNECOL, INC.

Mas#

: 70618051

PROJECT:

: HENKEL SURFACE TECHNOLOGIES

Sample LD.

: 102324.6 WASTE SOLID SOAPS

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the sample(s) received. Midwest is not responsible data interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

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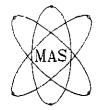
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- 2. N/D=Not detected.
- 3. Results relate only to the items tested.
- 4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight)
 ppb=parts per billion, µg/l, µg/kg or µg/kg(dry weight)
- 5. QC information on file.

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Sincerely,

Krystyna Czyzo
Lab. Quality Manager



"Where industry comes for answers" Metropolitan Center for High Technology 2727 Second Avenue Detroit, Michigan 48201 All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only)

: (313) 964-3680 Fax No: (313) 964-2339

IN: KC

TEST REPORT

MAS#:70618051

MOLLY DWINNELLS DYNECOL, INC. 6520 GEORGIA

DATE COMPLETED: 26-Jun-97 P.O. #: 115-3084

DETROIT, MI 48211

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 102324.6 WASTE SOLID SOAPS

PHYSICAL DESCRIPTION: SOLID

Sample Date: 13-Jun-97

file:Waste Dynecol

METHOD #	PARAMETER	Sample Result	UNITE	estimated Quant Limit	REGULATORY LIMIT	ANALYST	DATE ANAL
SH-846 1010	IGNITIBILITY	> 200	3 F		< 140 D001	CS	06/23/97
SW-846 9045C	*pH / CORROSIVITY	8.37	UNITS	m de les	<2 : >12.5 D002	CS	06/20/97
	REACTIVITY:	 				ĊS .	
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003		06/23/97
SW-846 7.3.4.2	REACTIVE SULFIDE	N/D	mg/kg	20	500 D003		06/20/97
SW-846 9020BM	TOTAL ORGANIC HALOGENS	N/D	mg/kg	100		GEM	06/24/97
8W-845 8080A	PCB;		mg/kg			DGB	06/20/97
	AROCLOR 1016	N/D		1.0			
	AROCLOR 1221	N/D		1.0		<u> </u>	
	AROCLOR 1232	N/D		1.0		.	
· · · · · · · · · · · · · · · · · · ·	AROCLOR 1242	N/D		1.0	<u> </u>		
	AROCLOR 1248	N/D		1.0	<u> </u>		
	AROCLOR 1254	N/D		1.0			
	AROCLOR 1260	N/D		1.0			
SW-846	TCLP METALE (1311):		mg/l			KRW	06/25/97
40103	ARSENIC	N/D		1.0	5.0 D004		
6010A	BARIUM	N/D		10	100.0 D005		
6010A	CADMIUM	N/D		0.50	1,0 D006		
6010A	CHROMIUM	N/D		1.0	5.0 b007		
6010A	COPPER	N/D		1.0	100.0 001D (MDNR)		
6010A	LEAD	N/D		1.0	5.0 D008		
7470A	MERCURY	N/D		0.10	0.2 D009		
6010A	NICKEL	N/D		1.0			
4010A	SELENIUM	N/D		0.50	1.0 D010		
6010A	SILVER	N/D		1.0	5.0 D011		
6010A	THALLIUM	N/D		5.0		<u> </u>	
6010A	ZINC .	N/D		5.0	500.0 003D (MDNR)		

^{*} Sample oh measured in water at 24.1°C.

Krystyna Czyzo Lab. Quality Manager

IV SHIPPING INFORMATIO	N				
Waste Volume: 50-15	UNIT: (circle one)	GALLONS	POUNDS TD	RUMS OTHE	P
ipment Frequency; (circle one)	WEEK MONTH	QUARTER	-	NE TIME ONLY	
DOT Proper Shipping Name per 49 CFR	172101: Waste Liquid	1			
907 Aparti Class:	UNINA Namber:		Packing Group:	I II I	II (None
y comments					
T GENERATOR CERTIFICA	TION				
CEORGE J. B. Contract Name (Please print or type) WASTE ANALYSIS	er er	-	Techni	Date Title	1 416 ager
MUM ANALYTICAL REQUIREME - Elash pH, and Reserves (De - PCS1 SHOCs (Method 9020) - TCLP metals: Arsenie, Barius - Michigan metals: Copper and (The above items may be restri	exection limit of 20ppm for C Nickel and Thallium m, Cadmium, Chromium, Le I Zinc	yanide and Solf	ide)	46):	
BORATORY ANALYSIS IS ATTACHE No Authorization for Dyneco Purchase Order #	ED FOR THE ABOVE ITEM Complete to perform analysis as nece	Parti SSRIY	al*	MSDS	
II DYNECOL USE ONLY					
proval #: 10241 street Facility: 5.0 Max	CME: 4			•	
iration date:	1/31/97		Date:		



ecertification: Y (N Approval # 102417 . 6

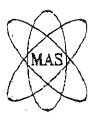
WASTE APPROVAL FORM

6520 GEORGIA STREET DETROIT, MICHIGAN 48211

PHONE: (313) 571-7141 FAX: (313) 571-7190

12an

		Code1.3.1()
I GENERAL INFORMATION	The second secon	
Customer: PARKER AMKHEM	Generator: SAM.	
Address: 32100 STEPHENSON HWY	4.11	
City: MADISON HEIGHTS	O	HEIGHTS
State: MT Zip Code: 48071	State: NI Zip Code:	45071
Contact: DELODES LEMBKE	Contact: GEORGE	BEYER
Phone #(810) 553-9300 Fax(510) 589-4834	Phone #: (810) 553 - 9.	PACFAX:
24 hour phone #:	EPAID#: MID C5	
WASTE DESCRIPTION		7 010 727
Waste Common Name: What The minute 55		THE REAL PROPERTY OF THE PROPE
pecific Process Generating the Waste:	ing mathell	. V. t. S
	The state of the s	ixi hampes
	-	
TE COMPOSITION (must equal 100%):	ACTUAL %	MIN. MAX.
linemin.	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
September 200	< 7	*
		A
IRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTED Proving Pro	osives Y (N) Phenols Y (N)	Hexavalent Chromium YN
defined in 40 CFR 268: () Non-wastewater (X) Wastewate		SOLID SLURRY
mple submitted to Dynecol: Y N Color:		
RCRA/ACT 64 WASTE CHARACTERIZATION	l l	
is is a hazardous waste as defined by either Michigan Act 64 or	EPA 40 CFR 261: Yes	No X
yes, list all waste codes:		
is is a non-hazardous waste as defined by Michigan Act 136:	Yes No	
res, list all waste codes: 0291		
ste contains a toxicity characteristic of 40 CFR 261.24 iden	tified as waste codes D018 thro	ough DA43.
No* Unknown		API PATA
'es, list all waste codes:		
based on generator knowledge, please read and understand certification in Section VI		
		Revised April '94



MENTOLI LITTMED I HUHET LITCHE DEKATOED TUA

"There industry comes for consume" Metropolitan Center for High Technology 2727 Second Avenue Detroit, Michigan 48201

A2LA Accredited Certification # 0381-01 State of Wisconsin Cortification #999941580 : (313) 964-3680 State of New Jersey Certification #62733 State of North Dakota Certification #R-085

P:1-800-801-4MAS (MI,OH,WI,IN,IL)

F: (313) 964-2339

Date

: 25-Jun-96

Client

: MOLLY DWINNELLS

DYNECOL, INC.

Mas#

: 60613017

PROJECT:

: PARKER AMCHEM

Sample LD.

: 102417.6 WASTE THERMINOL 55

The above mentioned project has been completed in accordance with the quality control and quality assurance criteria specified by the American Association of Laboratory Accreditation/SW 846/MDNR/WDNR and EPA references from 40 CFR part 136 gnidelines.

for your convenience the following legend applies to all the following data streets.

- 1. Reports shall not be reproduced, except in tall, without written approval of Midwest Analytical Services. Inc.
- 2: N/O=Not detected above Estimated Quantifation Limit, N/A=Not applicable
- 3: Results relate only to the items tested.
- 4. mg/l, mg/kg, mg/kg(dry weight) equal ppm(parts per million) μg/l, μg/kg, μg/kg(dry weight) equal pobloarts per billion)

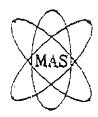
If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Sincerely,

Englique Bupito

Krystyna Czyzo Lab. Quality Manager



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A2LA Accredited Contification # 0381-01 State of Wisconsin Certification #999941580 : (313) 964-3680 State of New Jersey Certification #62733 State of North Dakota Certification #R-085

P:1-800-801-4MAS (MLOH.WLIN.IL)

F: (313) 964-2339

IN: SMR

TEST REPORT

MAS#:60613017

MOLLY DWINNELLS DYNECOL, INC. 6520 GEORGIA DETROIT, MI 48211

DATE COMPLETED: 25-Jun-96 P.O. #: 115-2396

PROJECT: PARKER AMCHEM

SAMPLE IDENTIFICATION: 102417.6 WASTE THERMINOL 55 6/12/96

PHYSICAL DESCRIPTION: LIQUID

FILE:WASTE\WCTC

MECHOD #	PARAMETER	SAMPLE	ETIKU	EBTIMATED	REGULATORY	ANALYST	DATE
a Paris de la la casa de la casa	. Book of growth in the same is a section in the same of the same	PESULT	the core, all the same	OGANT	ID A T	All described to the second se	ANAL
State particular de la companya de Caracteria de la companya de la com						Fig. 1 - Color Control of the Color of the C	The material and the second
	the state of the s	Chinadescol nat Chinase	anning more desirable		ALL reads in the principle of the princi		Service Control of Service Contr
SW-846 1010	IGNITIBILITY	> 200	, E	~~=	< 140 DOOL	SS	06/18/96
SW-846 9045C	*pH / CORROSIVITY	8,28					
,	MAN CONTOSTATI	9.25	UNITS	47.	<2 : >12.5 D002	BB	06/20/96
·	REACTIVITY:				d comments		06140 105
SW-846	REACTIVE CYANIDE	N/D	mg/kg	50	060 000	BB	06/19/96
7.3.3.2		II.	ma\ xa	30	250 D003		
SW-846	REACTIVE SULFIDE	N/D	mg/kg	20	500 9003		
7.3.4.2		1					
SW-846 8080A	PCB:		mg/kg		W 15. W	AAT	06/24/96
	AROCLOR 1016	N/D	71 149	1.0		1 -11/17	00/24/50
-	AROCLOR 1221	N/D		1.0			
	AROCLOR 1232	N/D	-	1.0			
	AROCLOR 1242	N/D		1.0			· · · · · · · · · · · · · · · · · · ·
	AROCLOR 1248	N/D		1.0			-
	AROCLOR 1254	N/D		1.0			
	AROCLOR 1260	N/D		1.0			
	TCLP METALS (1311):	,	mg/l				
6010A	ARSENIC	N/D		1.0	5.0 D004	KRW	06/20/96
5010A	BARTUM	21	-	10	100.0 D005	KRW	06/20/96
60107	CADMIUM	N/D		0.30	1.0 2006	KRW	06/20/96
6010A	CHROMIUM	N/D		1.0	5.0 D007	KRW	06/20/96
6010A	COPPER	N/D		1.0	100.0 001D	KORIW	06/20/96
5010A	LEAD	N/D	4	1.0	(MONR) 5.0 DOO8	KRW	06/20/96
7470A	MERCURY	N/D		0.10	0.2 DOG9	DJF	06/19/96
6010A	SELENIUM	N/D		0.50	1.0 Dolo	KRW	
6010A	SILVER	N/D		1.0	5.0 D011	KRW	06/20/96 06/20/96
6010)	ZINC	N/D		5.0	500.0 003D (MDNR)	KRW	06/20/96

*Sample oh measured in water at 23.6°C.

Knystyna Chapeto

Lab. Quality Manager



2955

DYNECOL, INC.

6520 GEORGIA STREE. DETROIT. MICHIGAN 4821. PHONE: (313) 571-714.

FAX: (313) 571-71%

WASTE APPROVAL FORM

Approval # 102417 6

Recertification YN

Code 1390

I GENERAL INFORMATION	
Customer: HENKEL SURFACE TECHNOLOGIES	Generator: SAME
Address: 32100 STEPHENSON HUY	Address: 32100 STEPHENSON HUX
City: MADISON HEIGHTS	City: MADISON HEIGHTS
State: MT Zip Code: 15071	State: MI Zip Code: USO71
Contact: DELURES LEANBEE	Contact: GEORGE BEYER
Phone #(510) 553-9300 Fx(510) 559-4834	Phone #:(810)=83 -9300Fax:
24 hour phone #:	EPAID#: MID 057 676 124
II WASTE DESCRIPTION	
Waste Common Name: WASTE THERMINOL	55
	FROM HEAT EXCHANGER
ASTE COMPOSITION (must equal 100%):	ACTUAL % MIN. MAX.
	100
THERMINOL	
	ERISTICS OR CONTAMINANTS blosives Y N Phenols Y Hexavalent Chromium Y N nicides Y N
As defined in 40 CFR 268: (Non-wastewater () Wastews	ater (LIQUID) SOLID SLURRY
Sample submitted to Dynecol: Y Color: RANN	
III RCRA/ACT 64 WASTE CHARACTERIZATION	
	or EPA 40 CFR 261: Yes No
This is a hazardous waste as defined by either Michigan Act 64	of EFA 40 CFR 201.
If yes, list all waste codes:	
This is a non-hazardous waste as defined by Michigan Act 136	: Yes No
yes, list all waste codes: O2 L	
his waste contains a toxicity characteristic of 40 CFR 261.24 is	dentified as waste codes D018 through D043:
Yes No Unknown Unknown	
If yes, list all waste codes:	
- If based on generator knowledge, please read and understand certification in Section VI	Revised Appl

IV SHIPPING INFO	RMATION	au.			
Waste Volume: 5-10	UNIT: (curce one)	GALLONS	POUNDS ?	DRUMS C	OTHER
Shipment Frequency: (circ	ie one) WEEK MONTH	QUARTER	Y E 43	ONE TIME C	NLY
DOT Proper Shipping Hame of	- H zardous. 2	igud			
	- TRATA Notice:		ومحتنمع والعمر	p: [[]	III (Yone
Y COMMENTS					
		-			
			M.I		
VI GENERATOR CE				-,, 40,500 1446	
	that I personally have examined and believe that the information I suom				and testing or Airough
GEORGE 3				9	9 97
	rim or type)			/_	Deta
Level a	Lever		/sul-	very	mase
Generalor Signature				1.	le /
II WASTE ANALYSI	S				
	QUIREMENTS FOR HAZARDOUS			574346):	
	etives (Detection limit of 10ppm for emod 9020). Vicket and Thailium	r Cyanide and Su	itice;		
· TCL Propals: An	senie, Barium, Cadmium, Chromium.	Lead, Meeury, S	cicnum. Siiver		
Michigan metals:					
	nay be restricted from land disposai.)		Terrilli ikaya i i i i i i i i i i i i i i i i i i		
	S ATTACHED FOR THE ABOVE ITS Complete		rcial	4 MS	DS
* Authorization	for Dynecol to perform analysis as no	scc225ELÀ			
Purchase Ord	CT #				
VIII DYNECOL USE O	NLY				
Approval #:			****		
Approved by:	CMF:	-			
Approved by:	9/20/90		Da	ıc:	



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2727 Second Avenue
Detroit, Michigan 48201

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Phone: 1-800-801-4MAS (MI only) : (313) 964-3680 Fax No. (313) 964-2339

Date

: 19-Sep-97

Client

: MOLLY DWINNELLS

: DYNECOL, INC.

Mas#

:70910017

PROJECT:

: HENKEL SURFACE TECHNOLOGIES

Sample I.D.

: 102417.6 WASTE THERMINOL 55

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services. Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the samples received. Midwest is not responsible for interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

- THY your convenience the rollowing legend oppiles to on the collowing acta streets.
- 1. Reports shoil not be reproduced, except in full, without written seprend of Midwest Analytical Services, ma
- 2. N/D=Not detected.
- J. Results relate only to the items tested,
- apm=ports per million, mg/l, mg/lg or mg/kg(dry weignt) cob=ports per billion, μ g/l, μ g/kg or μ g/kg(dry weignt)
- 5. OC information on file.

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You.

Sincerely,

Veryslyne Coupis

Krystyna Czyzo Lab. Quality Manager



When maining control for maintain
Metropolitan Center for High Technology
2727 Second Avenue
Detroit, Michigan 4820)
All test reports include a cover sheet.

Phone: 1-800-801-4MAS (Ml only) (313) 964-3680 Fax No: (313) 964-2339

IN: NWB

TEST REPORT

MAS #: 70910017

MOLLY DWINNELLS DYNECOL, INC. 6520 GEORGIA DETROIT, MI 48211

DATE COMPLETED: 19-Sep-97 P.O. #: 115-3269

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 102417.6 WASTE THERMINOL 55

PHYSICAL DESCRIPTION: LIQUID

Sample Date: 09-Sep-97

FILD: WASTEN DYNEROL

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	estimated Quant Limit	REGULATORY LIMIT	ANALYST	DATE ANAL.
SW-846 1010	IGWITTEILITY	> 200	15				<u> </u>
DA CAU ZUEG	1.401-1-51-11	2 200			- 140 2161		7,8×15 F
\$W-846 9045C	TpH : EORROSIVITY	3.58	STERK		NO : W10.5		1.0012 47
	REACTIVITY:	 	-	1		1:2:	
SW-846 7.3.3.2	REACTIVE DYADIDE	NYD	MQ - 42	<u> </u>	285 2113		1 . 2 . 2 . 2
SW-846 7.3.4.2	REACTIVE CULTICE	14-5	74 45		1 = 1 : 1 : 1		r :
5W-946 90205M		1	1		<u> </u>	!	1
SW-846 B080A	? C9:		ಗ್ರಹವಾಗುತ		1	1 5:34	
	ARCCLOR 1016	Î NAD	i i	1 1.1		 	
	AROGLOR 1221	N/ 5	<u> </u>		<u> </u>	ļ	
	AROCLOR 1030	NVE		1.4		·· ·	
***	AROCLOR 1242	N/E	 	1.5			
	AROCLOR 1248	Not		1 : :		-	
	AROCLOR 1054	N/ 2		1.3			-
	AROCLOR 1260	N/D	1	4			·
SW-846	TCLP METALS (1311):		metra .	1]
6010A	ARSENIC	N/D	TREE F			HEN	2 12 3
6010A	EARIUM	N/5	 	1.3	1.00 5:15	1	
6010A	CADMIUM	N/D	1	7.57 0.57			
6010A	CHRONIUM	N/ D	-	1.0	2.1 D098 5.0 D007		ļ
6010A	COPPER			1.7	5.1 0007 100.0 0015 (MDNR)		
6010A	LEAD	4.7	†	1.0	5 0 D009		
7470A	MERCURY	N/D	 	0.10	0.2 D009		
6010A	NICKEL	N/D	1	1.0		 	
6010A	SELENIUM	N/D	 	0.50	1.0 0010		
6010A	SILVER	N/D	1	1.0	5.0 D011		<u> </u>
6010A	THALLIUM	N/D	 	5.9	3,0 DOTT		·
6010A	ZINC	9.0		5.0	500.0 003D (MDNR)		

^{*} SAMPLE OH MEASURED IN WATER AT 19.2°C.

Knystynes Chapis

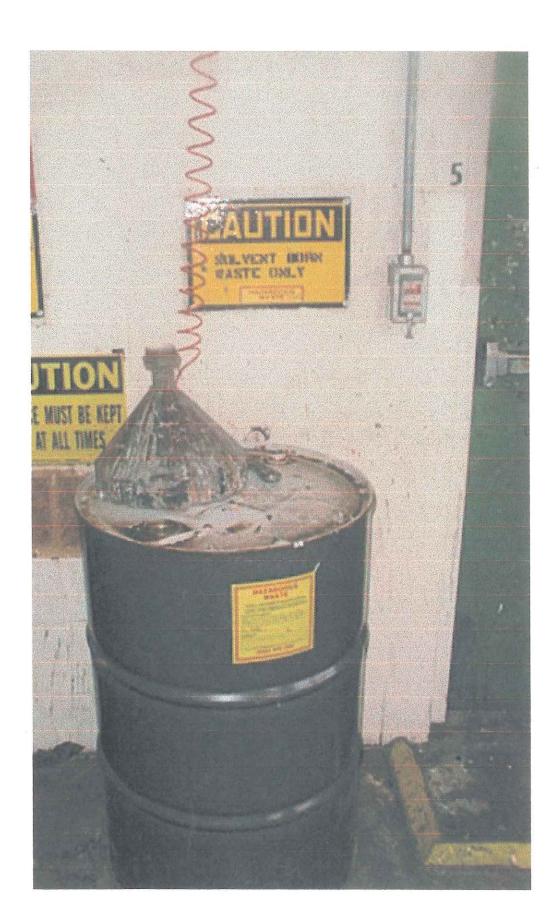
Krystyna Czyzo Lab, Quality Manager



FINDING NUMBERS TWO (2), THREE (3), & SEVEN (7)

- WEEKLY INSPECTIONS (SAMPLES)
- MONTHLY HOUSEKEEPING INSPECTIONS (SAMPLES)
- UPDATED HAZARDOUS WASTE PROGRAM
- PICTURES:

PROPERLY MARKED UP LABEL SATELLITE ACCUMULATION AREA HAZARDOUS WASTE STORAGE AREA





HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

F FRANC CONTACT THE MEARING REACH CHI PLANCE LAVIETY MUTHCHEN OR THE U.S. ENGINEERING RESIDENCE OF PROPERTY OF THE U.S. ENGINEERING RESIDENCE

GENERALES POSSIBLES

Mary Made and Statement

ACCORDING TO THE PARTY OF THE P

GREEN STATE AND TO THE

The / market wa

TOTAL DESIGNATION.

CONTRACTOR OF THE PARTY OF THE



FINDING NUMBER FOUR (4)

- HAZARDOUS WASTE RESPONSIBILITIES
- ACCOMPANYING INTERNAL MEMO



Henkel Technologies

MEMO

Date:

January 17, 2000

To:

M. Schubert

cc:

J. Garavanta, B. Keck, G. Kohlsmith, T. Snell

From:

R. Budnik

Subject:

U.S. EPA Mandated Updates to Job Descriptions for Waste Handling

Mike,

One of the issues pointed out by the U. S. EPA and the Michigan DEQ during their inspection of the Madison Heights facility for Hazardous Waste Compliance in September, 1999 was that our job descriptions did not adequately reflect or identify the waste handling duties of various personnel in this building who handle hazardous wastes.

As a resolution to this I have generated a list of hazardous waste responsibilities broken down into two categories which reflect the different levels of involvement that various personnel have with our hazardous waste management program here in Madison Heights. I have also summarized the various generic job titles into two lists under either Category I or Category II.

I have attached the document with the lists and waste responsibilities to this memo. The last step in complying with the U. S. EPA's request to update our job descriptions would be to attach my documents to all job descriptions in HR for the personnel titles in the category lists. Another option would be to insert the appropriate waste handling responsibilities into the job descriptions based on the categories.

If you have any questions or concerns with this matter please do not hesitate to contact me.

Thanks,

Bob

MADISON HEIGHTS HAZARDOUS WASTE RESPONSIBILITIES BY JOB TITLE

Category I

• Identify and Characterize Hazardous Waste

Characteristic Wastes

Listed Wastes

Waste Determination

• Large Quantity Generator Requirements

Accumulation Period

Container Management

Storage & Inspections

Adsorbents & Stabilization

Labeling, Manifests, LDRs

Loading of Wastes

Emergency Preparedness

Emergency Procedures & Training

Satellite Storage and Accumulation

- Release Reporting & Biennial Reports
- Management of Miscellaneous Wastes

Fluorescent Light Bulbs

Batteries

Used Oils

Category II

• Identify and Characterize Hazardous Waste

Characteristic Wastes

Listed Wastes

Waste Determination

• Large Quantity Generator Requirements

Accumulation Period

Container Management

Labeling Requirements

Storage & Inspections

Emergency Procedures & Training

Satellite Storage and Accumulation

Category I

Maintenance Personnel
Shipping & Receiving
Custodial Service Group Leader
Regulatory Affairs Manager
HS&E Specialist
H&S Specialist
Director RAPA

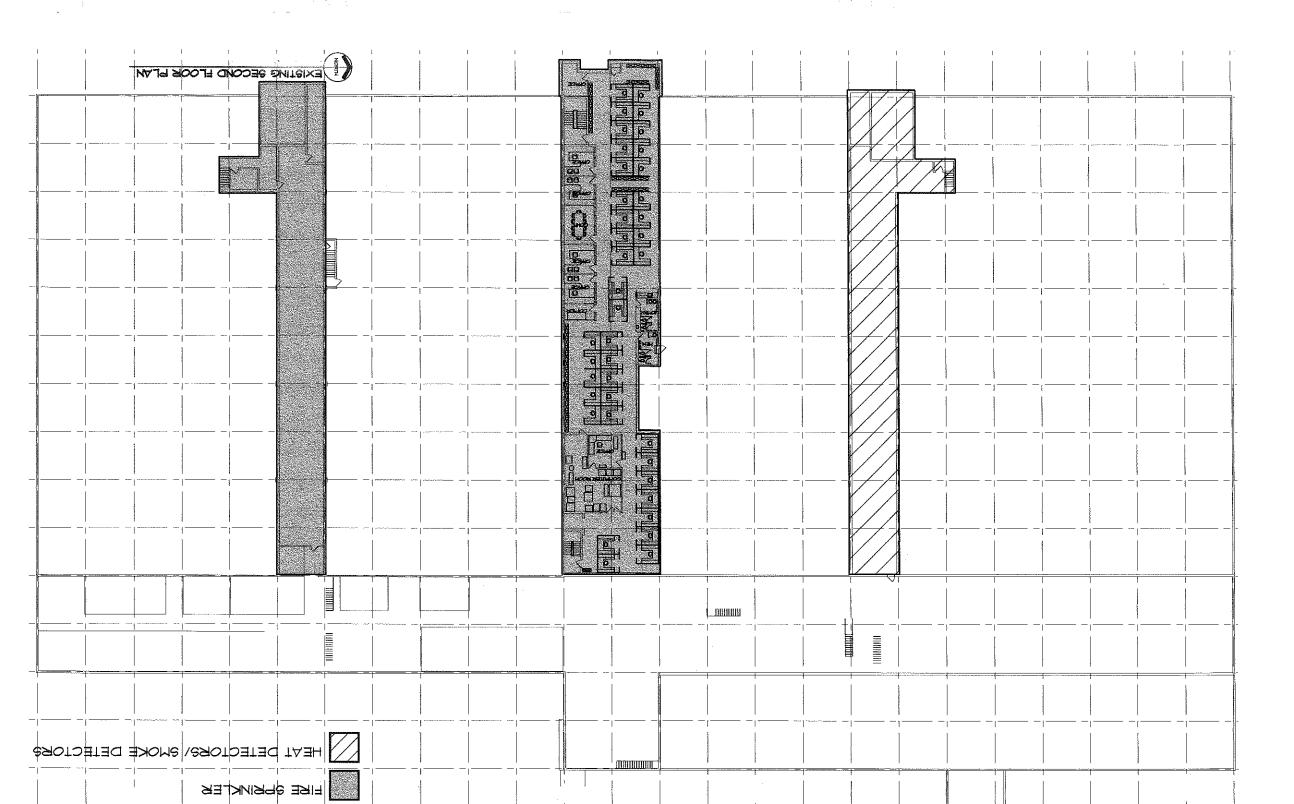
Category II

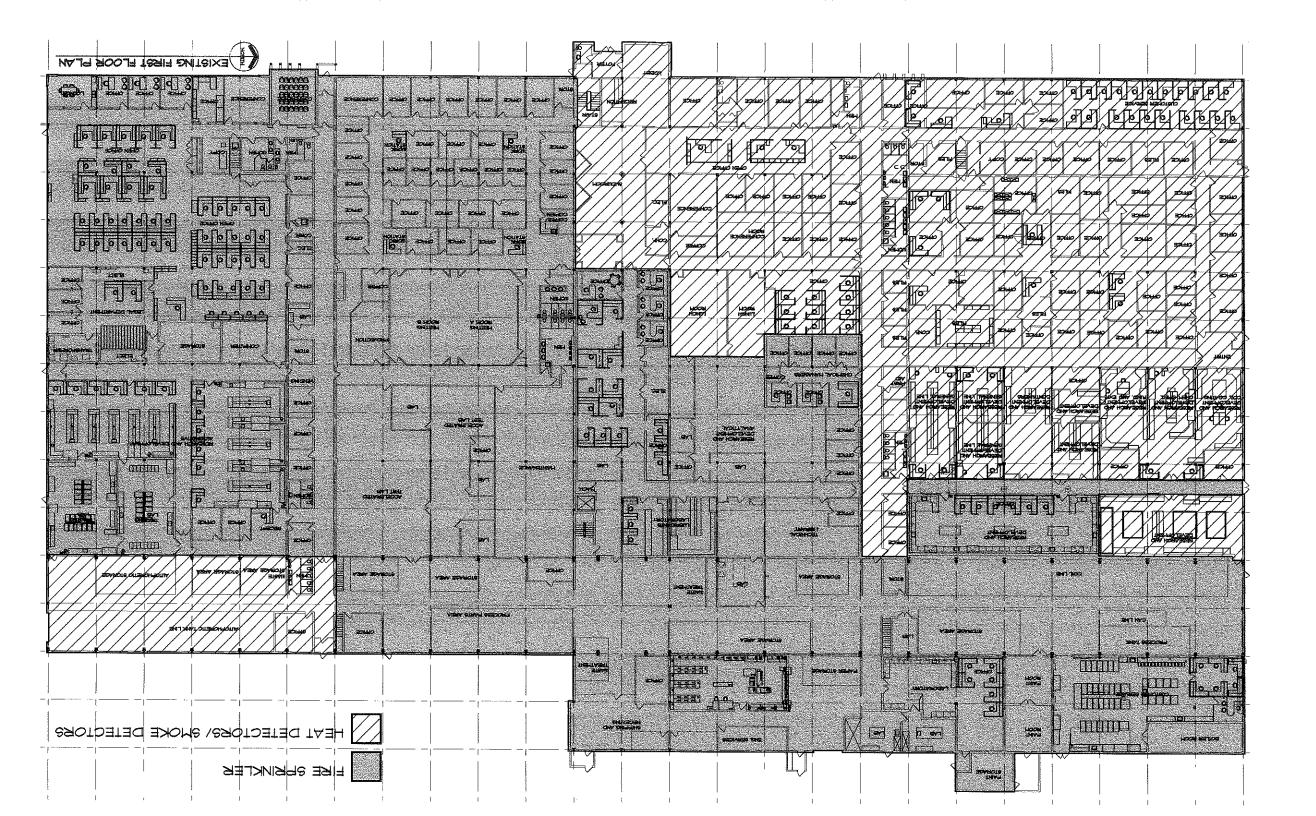
Technical Service Reps
Technicians
Chemists
Scientists
Laboratory Manager
Technical Managers
Technical Director
Application Painter



FINDING NUMBER FIVE (5)

• BUILDING LAYOUT





FACILITY CHEMICAL STORAGE AND LAB AREA LAYOUT

See Figure 1,page 11..

INVENTORY OF MATERIALS STORED IN THE FACILITY

An inventory of materials is available by Henkel Surface Technologies at all times. (see Appendix B). The listing includes the incoming products and finished products at the facility at any time.

LOCATION OF MATERIAL SAFETY DATA SHEETS

Material Safety Data Sheets for chemicals are located as follows:

Raw materials and Finished goods - in the RAPA office area.

NOTIFICATION PROCEDURES

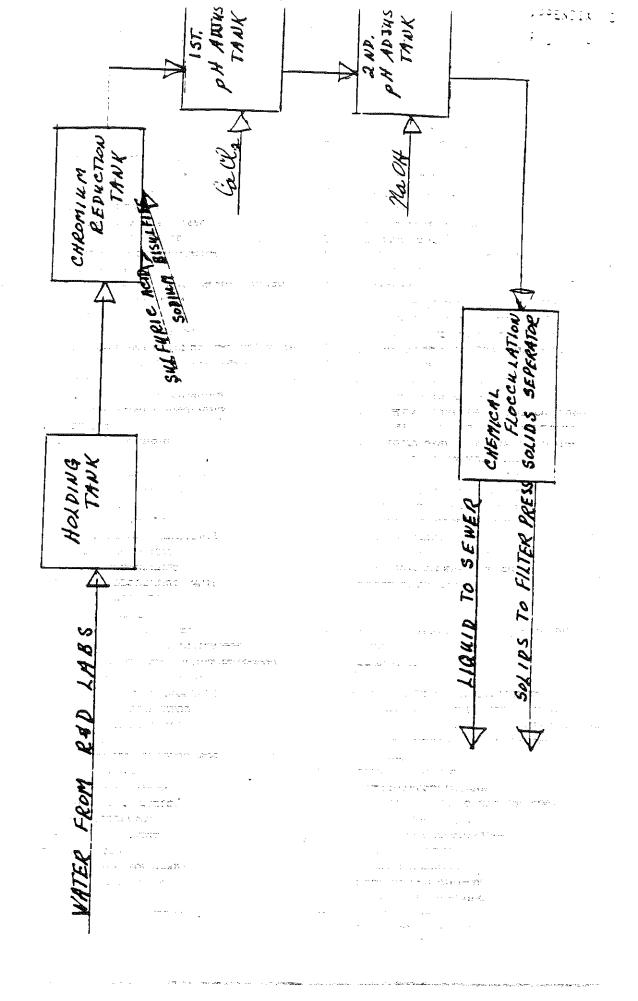
In the event of a fire, explosion, or release of oil or chemicals associated with the storage and production areas, notification procedures are as follows:

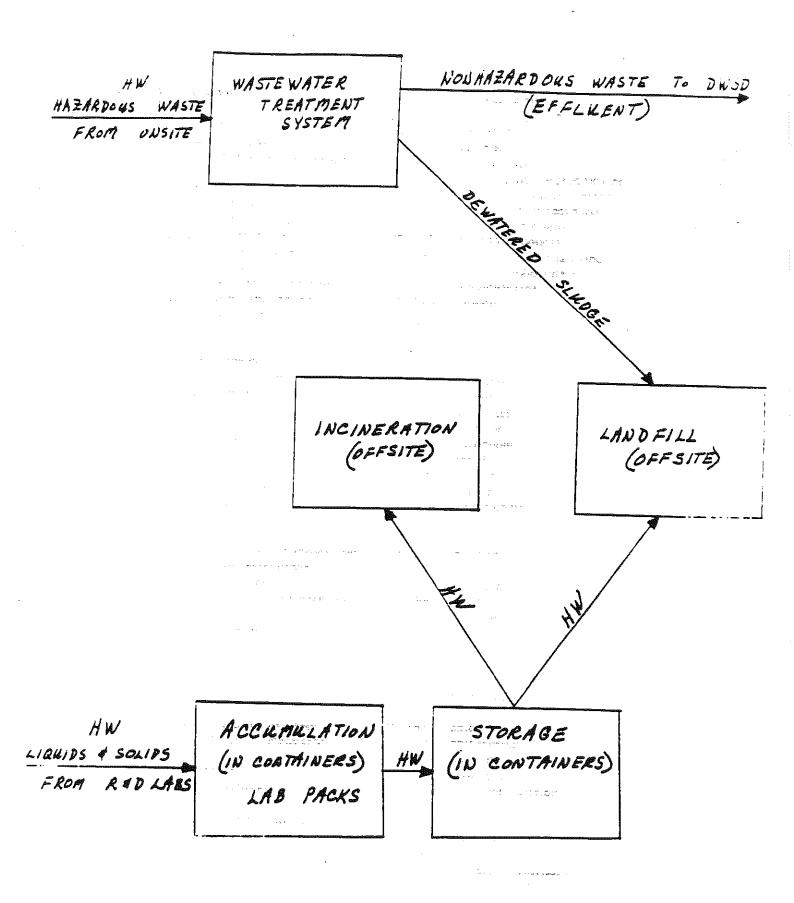
- Any employee(s) encountering an emergency situation will immediately alert key onsite personnel.
- If key personnel are not onsite, the switchboard operator (day shift) will be immediately notified and will alert key personnel.
- The operator (or designated supervisor during second shift) will call the appropriate personnel and notify them of any emergency event associated with the chemical storage area.

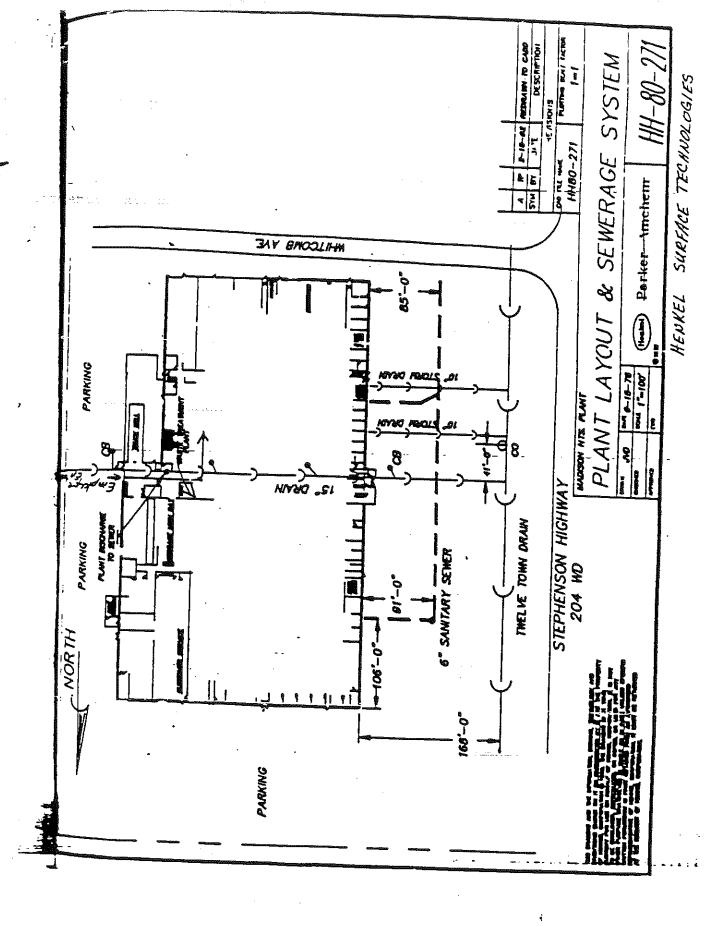
If the emergency event occurs during nights, evenings, weekends, or holidays when no facility personnel are present, the following occurs:

- In the event of a break-in, the security company notifies the police and key plant personnel.
- In the event of a fire, the sprinklers are set off, the security company then notifies the fire department and key plant personnel.

In the event of a spill in the bulk storage area, an alarm will alert the security company.







State of Micmoan Department of Natural Resources

REPORT OF OIL SALT OR POLLUTING MATERIAL LOSSES

Pursuant to the provisions of Act 245 of the Public Acts of Michigan 1929 as amended, regulations have been stack which require that all owners, managers of operators of vessels, oil storage or on land facilities shall notify the water Resources Commission or his authorized representative of oil, salt and polluting material losses. This notification shall be made promptly by telephone or telegraph, giving briefly the particulars, and by mail, giving a detailed account of events and conditions.

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Return this form to: Remedial Action Section
Ground Water Quality Division
Michigan Department of Natural Resources

Box 30028 Lanung, Mich. 48508 24 hr. Emergency Medification Number 517/373-7668

#### <u>Key</u>

> = chemical available on site.

# E.P.A. PRIORITY POLLUTANTS_ and MICHIGAN CRITICAL MATERIALS LIST

#### ORGANICS

- 1. acids
  - 2. acenaphthene
  - 3. acetone cyanohydrin
  - 4. 2 acety iamino fluorena
  - . acrolein
  - 6. acrylic acid
  - 7. ac rolyonit rile
  - 8. allyl chloride
  - 9. 2 aminoanthraquingne
  - 10. aminos zobenzene
  - 11. o-aminos zoto luene
  - 12. 4-aminobiphenyl
  - 13. 3-amino-9-ethyles respole
  - 14. 1-amino-2-methylanchracuin
  - 15. aminotriazole (amitrole)
- D 16. aniline
  - 17. aniline hydrochloride
  - 18. o-anisidine

- 19. o-anisidine hydrochloride
- 20. benz(a)anthracens
- ≥ 21. benzene
  - 22. benzidene
  - 23. benzidene salts
  - 24. benzo(a)ov rene
  - 25. brucine
- D 26. carbon tetrachioride
  - 27. chiprinated banzenes
  - 27. & chiorobenzene
  - 27. b. 1,2,4-trichkorobenzene
  - 27. c. 1,2 -dichlorobenzene
  - 27. d. 1,3 -dichiorobenzene
  - 27. e. 1,4-dichiorobenzene
  - 28. chlorinated dibenzofurans
  - 29. chlorinated dioxins
  - 30. chlorinated exhanes
- D 30. a. 1,1,1-trichlorosthene
  - 30. b. 1,1 -dichlorosthane
  - 30. c. chloroethane

PEN11	ICIDES	221. 222.	hentachlor agos free isomers of hexachlorocyclohexane
173.	aldicarb	222.	a. a-BHC-Ainna
174.	aldrin	222.	h. h-IIHC-Heta
175.		222.	c. g-HI+C-I>elta
	4 - aminupy ridine	223.	leptophos
176.	ani lazine	224.	malathen
177.	antimycin A	225.	metabolites of DDI
178.	az inphos - et hy l	225.	a. 4,4'-!X)F;(p,p'-!X)E)
174.		225.	- h 4,4'+1XX);(p,p'+11)f1
180.	barhan	226.	metabolites of endosulian
181.	benduicarb	226.	a. endosulfan sulfate
182.	pencany i	227.	metabolites of endrin
183.	hremosynil	227.	a. endrin aldehyde
1 H 4.	2(p - tert - buty lohenoxy) - isoprapy l	228.	metabolites of heptachkir
	2-chloroethyl sulfite	228.	a. hentuchkir epistide
185.	cantafol	229.	met horny i
186.	Capt an	230.	methosychia
187.	carharyi	231.	methly mercaptan
MM.	Carixyfuran	232.	methy liparatham
184.	carizanhema haon	211.	mevinohas
(14)	chkirdane	234.	mexacarbate
191.	chia rdecone	2.15.	mires
192.	chkirfenvinghos	236	manuc resembles
141.	chlorobenzilate dia in annual accessor of	237.	naled
144.	chlarpyrifos	238.	nicut ine
195.	ckmitraiki	214.	nitrofen
196.	Coumanines	2411.	oxydemeton -methiv
197.	Criting visites	7.41	·
198.	cyclaheximide	241.	na raquat
44.	13)		narathen
200.	(jenned)	243.	phorate
201.	diallate	244.	phosa cet im
202.		245.	phosmet
	diazinan	246.	phosphamidon
203.	dibrumenthlarupropane (DICP)	247.	rot enune
- · •	dichlore	24 <b>A.</b>	silvex, propulene givenitural ether
205.	dichieres		ester
	dichrenennus	244.	salium flancacetate
207.	dielden	250.	strychnine
208.	dimethaste	251.	wifailate
209.	dinocap	252.	sulfatep
210.	diuseh	253.	IDE
11.	dissathem	254.	1544
212.	disulfator	255.	terhuíos
273.	maisulfan	256.	tetrachlorvimphas
74.	(=Aliu	257.	thiram
215.	FIN	258.	toxaphene
21h.	ed pan	254.	trichkorfem
17.	fensulfothism	2141.	trichkorophenoxyacetic acid
18.	tenthem		(2,4,5-1)
19.	fluchkeratin	261.	trifluralin
220.	hanstachker g	264.	Lifam .

				i e
	30,	d. 1,1,2,2-tetrachioroethane	69.	ethylene dibromine
	31.	chioronated napthalene	70.	ethyleneimine
	31.	a. 2-chloronanthaiene	71.	ethylene oxide
	32.	chiorinated phenois	72.	ethviene thiourea
	32.	a. 2 - chio rophenol	73.	bis (2 -ethy lhexy i) prithalate
	32.	b. parachio rometa - cresol	74.	· · · · · · · · · · · · · · · · · · ·
	32.	c. 2,4 - dich lo rophenol	75.	fluoroanthene
	33.	1 - chloro - 2,3 - epoxypropane	76.	2-(2-formy thydrazino) - 4-
	34.	chioroalky! ethers		(5-nitro-2-fury)thiazole
	34.	a. 2-chloroethyl vinyl ether (mixed)	77.	Haloethers
	35%	bis (2-chloroethyl)ether	77:	a. 4-chiorophenvi phenvi ether
$\triangleright$	36.	Chioroform	77.	b. 4-bromophenyi phenyi ether
	37.	bis (2 - chloromethy I) ether	77.	c. bis(2-chloroisoproply) ether
	38	3-(chloromethyl)pyridine hydrochlorid		d. bis (2 -chloroethoxyl) methane
	39.	1 - (4 - chlorophenyl) - 3,3 - dimethyl	78.	Halomethanes
		triazene	<b>&gt;</b> 78.	a. methylene chloride;
	40.	4 - chioro - m - phenienediamine		(dichloromethane)
	41.	4 - chloro -o -phenylenediamine	7 <b>8.</b>	b. methyl chloride; (chloromethane)
	42.	ch lo roprene	78.	c. methyl bromide; (bromomethane)
	43.	5 - chloro - o - toluidine	78.	d. bromoform; (tribromomethane)
	44.	p-cresidine	78.	e. dichlorobromomethane
	45.	2,4-diaminoanisole sulfate	78.	f. trichlorofluoromethane
	46.	4,4-diaminodiphenyl ether	78.	g. dichlorodifluoromethane
	47.	2,4 -diaminotoluene	78.	h. chlorodibromomethane
	48.	dibenz(a,h)anthracene	79.	hexachlorobenzene (HCR)
	49.	tris (dibromoo rony I )phosphate	80.	hexachlorobutadiene
	50.	dien-butly phthalate	81.	hexach lo rocyclohexane
	51.	3,3 -dichlorobenzidine	82.	hexachlorocyclopent ad iene
	52.	3,3 - dichlorobenzidine salts	A3.	hexachio roethane
	53.	1,2-dichloroethane	84.	hydrazobenzene
	54.	dichloroethy lenes	, 85.	hydroquinone
	54.	a. 1,1 - dich lo roethy lene	åb.	N-(2-hydroxyethyl)ethyleneimine
	54.	b. 1,2-trans-dichloroethylene	87.	isophorone
	55.	dichloropropane and dichloropropene	an.	lactonitrite
	55.	.a. 1,3 -dichloropropylene;	A9.	malachite green
		(1,3 -dichloropropene)	90.	methylenebis (2-chloroaniline)
	55.	b. 1,2 -dichloropropane	91.	4,4-methy lenebis (2-methy laniline)
	56.	1,2:3,4-diepoxybutane	92.	4,4-methy Inenhis (N,N-dimethy laniline)
	57.	diethyl sulfate	93.	1,2(methylenedioxy)-4-propenyl
	58.	4 - dimethy laminoazobenzene		benzene
	59.		94.	methyl hydrazine
	60.	2,4-dimethyl phenol	95.	1 -methy imanhthalene
	61.	,	96.	2 -methyl-1-nitroanthraquinone
	62.	2,4-dinitrophenol	97.	mustard gas
	63.	•	98.	1,5-naphthalenediamine
	64.		<b>⊳</b> 99.	1 -naphthy lamine
	64.		100.	2 -naphthy lamine
	65.	· ·	101.	5 - nitroacenaphthene
	66.	•	102.	
	67.		<b>▶</b> 103.	
	68.	et hy lben zene	1114.	4 -nit robipheny l

				•
105.	nitrogen mustard		135.	ter rachine construit
106.	2 -nitrophenoi -		136.	
107.	4 - nitrophenol		137.	
108.	Nitrosamines		138.	
108.	a. N-nitrosodiphenylamine	-	139.	
108.	b. N-nitrosodi -n-propylamine	-		100000
109.	N-nitroso -n -buty  -N -		140.	
	(4-hydroxybuty!) amine		141.	a farme watering too
110.	N-nitrosodiethy lamine		142.	I Diospirate esters
111.	N-nitrosodimethy lamine		143.	· · · · · · · · · · · · · · · · · · ·
112.	p-mtrosodiphenylamine	<b>6</b>	144.	TO THE STATE OF TH
113.			145.	trichlorophenois
	N-nitroso -N-methylurea		146.	2,4,5-trimethylaniline
115.	N-nitroso-N-methylurethane		147.	
116.	N-nitrosomethy lyiny lamine			vinylchloride
117.	N-nitrosomorpholine		149.	xylene
118.				
1100	N-nitroso - N-pheny lhydrox I - amine,			
119.	ammonium sait		A. IN	NORGANICS
120.	N-nitrososa rcosine	**.	or early to	<u> १९५७ में स्टब्स्ट</u>
	pentachioronitrobenzene	-	150.	ant impny
121.	pent ach lo rophenol	D	151.	arsenic
122.	peroxyacetic acid		152.	beryllium
123.	phenol		153.	Cadmium
124.	Phthalate esters	$\triangleright$	154.	chromium
124.	a. butyl benzyl phthalate		155.	cobait
124.	b. diethyl phthalate		156.	Coppe :
124.	c. dimethyl phthalate		157.	cyanides
125.	piperonly sulfoxide		158.	hypochlarite
126.	polybrominated biphenyls (PBB)		159.	lead
127.	polychlorinated biphenyls (PCB)		160.	lithium
128.	Polynuclear aromatic hydrocarbons	D	161.	mercury
128.	a. 3,4 -benzofluorosmhene	_	162.	
128.	b. benzo(k) fluoroanthane;		163.	selenium
	(11,12-benzofluorcanchene)		164.	
128.	C. chrysene	-	165.	thallium
128.	d. acenaphthylene	D	166.	zinc
128.	e. anthracene	•		
128.	f. benzo(ghi)nervlene;			
	(1,12 - benzopery lene)			医铁色 化二甲基甲酰胺 医鼻腔
128.	g. fluorene	•	B. IN	DRCANICS
128.	h. phenathrene			
128.	i. indeno(1,2,3 -cd)pyrene:	D	167.	acids
	(2,3-0-pheny lenepy rene)	_	168.	chloramines
128.	i. Dy rene		169.	
128.	k. naphthalene		170.	- ,
124.	1,3-propane sultone		171.	
130.	R-propio lactone		17 16	WACKEN WILIGE
	5 - propyl - 1,3 - benzodioxole			· · · · · · · ·
132.	propy leneimine		م	086 hive
	semicarbazide	,	6. IM	ORGANICS
49.	Sivrene		494	nahanan 16th -
			1/60	asbestos (fibrous)

#### Appendix B

Fire Extinguishers 

Three types are available. See attached floor plan for location.

### Location

Emergency Oxygen

1. First Aid Room (D-73)

2. Maintenance Office

3. Second Floor, Xerox Room

4. New Lab Area, West Hall

#### Fire Hydrants

Front of Facility (West side) at main lobby entrance.

Southwest of Facility, across side street (Whitcomb).

Northwest of Facility, near parking lot.

### Spill Control Equipment

Neutralization - Soda Ash (TD 1500 - 0)

<u>Quantity</u>

Location

100 lb.

Applications Lab.

#### 2. Oil Absorbent

Quantity

Location

75 lbs., Spill Tamer /5 lbs., Spill Tamer Technical Stockroom
1 case Sorbent Pillows Maintenance Stockroom
1 case Sorbent Pads 1 case Sorbent Pads 200 lbs. Zorb-All

Maintenance Stockroom Maintenance Area

#### 3. <u>Containers</u>

Quantity	<u>_Size_</u>	Location
Steel, open head Steel, closed head with poly liner	55 gal. 55 gal.	Shop Area or Stockroom Shop Area or Stockroom

#### Communications

Alarm: Main lobby, switchboard activated.

Phones: All laboratory and office areas.

ADT: Fire pull boxes - throughout building in halls.

### Statement of Approval by Registered Professional Engineer:

"I have examined this facility and am familiar with the provisions of Title 40, Code of Federal Regulations 112, and attest that the Spill Prevention Control and Countermeasure Plan for this facility has been prepared in accordance with good engineering practice."

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C. W.		
DAVID LESTINGUED: CANAL THORNTON	L. Shymton PE	Date: 3/18/99
ENGINEER	David L. Thornton, P.E.	The tradegraph and the state of
No 31877	Michigan Registration Numbe	r: 31877
The Robert State of the State o		and the state of t
Facility Manager:	home of	Date: 3/18/99.
	Thomas M. Snell	
		en de la general de la companya del companya de la companya del companya de la co
_	-/./	
Date of Next Mandat (Every three years)	ory Review: $3/18/02$	



### FINDING NUMBER NINE (9)

- COPY OF RECYCLING PROGRAM DOCUMENTATION
- ANALYTICAL DATA FOR THE PAINT FILTERS



#### THE ENVIRONMENTAL QUALITY COMPANY

36255 MICHIGAN AVENUE - WAYNE, MICHIGAN 48184 - tel 734 329-8000 - fax 734 329-8140 - www.egonline.com

*

Recycling: Following are several different pricing options for the recycling of universal wastes. EQ can provide personnel to sort and package materials as requested by Henkel. Pricing is outlined for lamps, batteries, office paper, cardboard and scrap steel. EQ can also provide recycling for computer monitors, mercury electrical equipment and PCB ballast/materials if required. Pricing is provided for common types of lamps and batteries although we can manage many types of materials and further pricing can be provided upon request. Transportation pricing for the lamps and batteries is noted above via tractor-trailer or barrel truck.

*	Recycling	of Lamps
٦.	riceyemig	oj Lumps

Fluorescent 4' and compacts	\$0.32/lamp
Fluorescent 5' and greater	\$0.50/lamp
Fluorescent Tube Option	\$0.09/foot



Alkaline AAA through D

Nickel Cadmium

Lead Acid (Dry)

\$0.89/pound
\$1.12/pound
\$0.55/pound

Office Paper & Cardboard:

Option A: EQ will provide one 8-yard box to be placed on site for the collection of office paper and cardboard. The box will be emptied once per week or as requested by Henkel. Pricing includes the recycling box, transportation, pick-up fees and rental. EQ will credit Henkel's account for the recycled paper. This amount may vary based upon quantity, type of paper and the market value of recyclable materials.

**Eight-Yard Box** 

\$120.00/month/box

#### Option B:

EQ will provide 90-gallon recycling bins to be placed throughout specified office areas. The bins will be emptied as requested by Henkel. Pricing includes the recycling bins, transportation, pick-up fees and rental. EQ will credit Henkel's account for the recycled paper. This amount may vary based upon quantity, type of paper and the market value of recyclable materials.

Recycling Bins

\$65.00/month

Scrap Steel: A 10-12 Yard Box will be placed on site for the collection of scrap metal. The box will be switched out once per month or as frequently as requested. The monthly pricing includes rental and transportation. EQ will credit your account for the recycling of the scrap metal. The credited amount may vary as the market fluctuates within the scrap metal industry.

Monthly Fee

\$125.00/month/box

**Emergency Response**: EQ can provide 24 hour emergency response at your Madison Heights Facility. EQ's emergency response team has the ability to handle your emergency spill from start to finish. A detailed brochure is attached for your information.

**Industrial Cleaning**: EQ Industrial Services can provide virtually all of your industrial cleaning needs. Pricing can be quoted upon your request.

**Training**: EQ can provide on-site training for Henkel personnel. We provide OSHA refresher courses along with RCRA 2-hour refresher courses. Pricing can be quoted upon request.

Materials: EQ can provide all necessary materials to handle your waste management needs.

55-Gallon Steel Drums

\$35.00/drum

Open or closed top

\$85.00/box

One Yard Boxes

Boxes for Lamp Shipment (4' or 8')

\$6.60/box

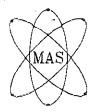
Labpacks: Labpacks will be scheduled once every six weeks or as requested by Henkel. See Attachment A for pricing.

If you have any questions regarding the above scope of work, feel free to give me a call at anytime. Once again, thank you for choosing EQ and related companies for your environmental management solutions.

Sincerely,

Jennifer LaPeer Chopp Resource Manager

734-547-1005



### Midwest Analytical Services, Inc.

"Where industry comes for auswers"
Metropolitan Center for High Technology
2727 Second Avenue
Detroit, Michigan 48201
All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only) : (313) 964-3680 Fax No: (313) 964-2339

Date

: 28-Dec-99

Client

: MOLLY DWINNELLS

: DYNECOL, INC.

Mas#

:91222018

PROJECT:

: HENKEL SURFACE TECHNOLOGIES

Sample I.D.

: 107385,6 PAINT BOOTH FILTERS

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the samples received. Midwest is not responsible for interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

For your convenience the following legend applies to all the following data sheets.

- 1. Reports shall not be reproduced, except in full, without written approval of Midwest Analytical Services, Inc.
- ?. N/D=Not detected.
- 3. Results relate only to the items tested.
- 4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight)
  ppb=parts per billion, µg/l, µg/kg or µg/kg(dry weight)
- 5. QC information on file.
- 6. EQL=Estimated Quantitation Limit.
- 7. N/A=Not Applicable.

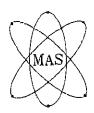
If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Sincerely,

Nove Brown

Norman Brooks Customer Service Quality Manager ext. 130



## Midwest Analytical Services, Inc.

"Where industry comes for answers" Metropolitan Center for High Technology 2727 Second Avenue Detroit, Michigan 48201 All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only) : (313) 964-3680 Fax No: (313) 964-2339

IN: CDH

TEST REPORT

MAS #:91222018

MOLLY DWINNELLS DYNECOL, INC. 6520 GEORGIA DETROIT, MI 48211

DATE COMPLETED: 28-Dec-99 P.O. #: 115-4947

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 107385.6 PAINT BOOTH FILTERS

PHYSICAL DESCRIPTION: SOLID

Sample Date: 22-Dec-99 REGULATORY ANALYST DATE DATA COLUMN PARAMETER SAMPLE HOL METHOD # ANALYZED PLAG LIET RESULT 12/23/99 D001 RA < 140 200 IONITABILITY 9W-846 1010 12/23/99 NW 6.78 UNITS SW-846 9045C *pH / CORROSIVITY D002 REACTIVITY 12/27/99 50 250 D003 N ma/ka REACTIVE CYANIDE N/D 3W-846 12/27/99 D003 NW NEGATIVE REACTIVE SULFIDE 40 CPR 261.23.5 H 12/27/99 TOTAL DEGANIC EALOGENS N/D mg/kg 100 SW-845 9020BM 12/24/99 DGB mg/kg 6W-846 8082 PCBI 1.0 N/D AROCLOR 1016 N/D 1.0 AROCLOR 1221 N/D 1.0 AROCLOR 1232 1.0 AROCLOR 1242 1.0 N/D AROCLOR 1248 1.0 N/D AROCLOR 1254 N/D AROCLOR 1250 12/27/99 ΜV mg/1 TCLP METALS (1311) BW - 946 N/D 1.0 5.0 D004 601.GA ARSENIC D005 10 100 N/D 6010A BAR1UM D006 0.50 1.0 N/D 60102 CADMIUM 0007 1, . 0 5.0 N/D 5010A CHROMIUM 5.0 D008 1.0 N/D LEAD SOLOA D009 N/D 0.10 0.2 7470A MERCURY 0010 1.0 0.50 N/D 6010A SELENIUM D011 1,6 5.0 N/D 6010A SILVER 12/27/99 DGB mg/1TCLP VOLATILES (1311); 4W-246 8260B D018 N/D 0.50 0.5 BENZENE D019 N/D 0.50 0.5 CARBON TETRACHLORIDE DOZI N/D 0.50 100 CHLOROBENZENE 5.0 D022 5.50 N/D CHLOROFORM D028 0.50 0.5 1,z-dichloroethane D029 0.7 0.50 N/D 1.1-DICHLOROETHYLENE D035 200 10 N/D METHYL ETHYL KETONE D039 0.7 N/D 0,50 TETRACHLOROETHYLENE D040 N/D 0.50 0.5 TRICHLOROETHYLENE D043 0.20 0.2 N/D VINYL CHLORIDE 12/23/99 DOS mg/1 54-946 9270B TCLP SEMI-VOLATILES (1311) : LK 7.5 D027 N/D 1,4-DICHLOROBENZENE 0 13 0.13 D030 N/D 2.4-DINITROTOLUENE 0.13 0032 0.13 N/D HEXACHLOROBENZEND DQ33 0.13 0.5 N/D HEXACHLOROBUTADIENE LH D034 3.0 2.0 N/D HEXACHLOROETHANE D035 N/D 7.0 2.0 NITROBENZENE 5.0 D038 2.0 N/D PYRIDINE 10 200 D026 N D TOTAL CRESOL 100 D037 3.0 PENTACHLOROPHENOL N/D 2.0 400 D041 2.4.5-TRICHLOROPHENOL N/D 2.0 2.0 D042 N/D 2.4.6-TRICHLOROPHENOL

*SAMPLE PH MEASURED IN WATER AT 20°C.

Surrogute apike indicates low recovery.

QC indicates low recovery for this analyte.

Norman Brooks

Customer Service Quality Manager ext. 130



#### WASTE CHARACTERIZATION DATA CHANGE FORM BFI VERSION

IMPORTANT: THIS FORM IS TO BE COMPLETED AND SIGNED BY A BFI REPRESENTATIVE WHO HAS HAD PERSONAL CONTACT WITH THE GENERATOR'S REPRESENTATIVE. THIS FORM CANNOT BE USED FOR CHANGES TO THE FOLLOWING: Special Waste WCD sections 2(a), (b), (c), and (d); 7 and 9; Petroleum Soils WCD sections 2(a), (c), (e); 4; and 6. THIS FORM MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK.

	. GENERATOR	INFORMA	TION	•	
0					
a) Generator's Name: PARKER AMCHE b) Generating Facility Address: 32100 STE City MADISON HOTS. State MI. Z c) Description of the Waste: NON - HAZBRDONS FILTO PRESS SCUDGE	PHENSON ip 45071 ER	BFI Lat e) Comp Name: Title: _	al WCD Number: poratory Number _ any Representative PANDY FACILITY 2-15-75 Time	22 Contacted: LEME MANN	8816 FXT
	2. AMEN	DMEN 13	miss	· · · · · · · · · · · · · · · · · · ·	
The following changes are to be noted for the above  a) Section:  Describe:  Addition Deletion  Describe:  Addition Deletion  Describe:  Wastewater from R  Saboratores discharge water  c) Section:  Describe:  Elter Cake Solids  Felter Cake Solids  d) Section:  Describe:  Describe:  Addition Deletion  Deletion  Describe:  Describ	Change  S FILT  Change  # D labo  Foluble  Change  20-25	is to clean tains 76 + W	eated in a ners and tr gacils/ala ater 75-8	oysten extrest extrest extis, ch	100% Z. 2-10%
I hereby certify that I made personal contact with the and time and at the telephone number shown summarizations of my conversations with the gene deliberate or willful omissions of misrepresentation	above, and terator or gener	r authorize that all an	ed generator repres nendments shown norized representat	: above are tive. I further	complete and accurate certify that there are no
X	∕Signature		Waste System	<b>S</b> ™	Recycled paper 🐔 🏅
BFI Initiator: CAUDIA BURCH  Company Number: 687 Date: 2-15-95  wcdchange/8ff		Locati Teleph	La	<b>Claudia J. E</b> Indfill Sales Rep Michigan Lar	leze: irani-
9/93  © Browning-Ferris Industries, Inc. 1993			BROWNING-FERRI 10690 Six Mile Road Northville, Michigan		(810) 347-9888 Fax (810) 347-9899



aei	WAS	TE C	ODE	

WASTE APPRO	VAL REQUEST
BFI to complete this area.  BFI Initiator:  Location:  Company Number:  Telephone: (8/0)  Fax: (8/0)  Date:  1 BURCH  BURCH  BURCH  BURCH  BURCH  BURCH  BURCH  AH  287 - 988  1 - 38 - 95	Action Requested: New Waste Approval  Up-Date Approval - Previous Number:  Disposal Site Requested: Att  Company Number: 61  Management Method Requested: Alandfill Hauling  Other
COUNTY: DAK CAND WASTE CHARACT	TERIZATION DATA L WASTE
IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATION INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO LEGIBLY PRINTED IN INK, AND SIGNED.	VE OF THE WASTE GENERATOR. PLEASE READ THE D BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR
	R INFORMATION
a) Generator's Name: PAILER AMCHEM b) Generating Facility's Address: 32 LOO STEPHEUSON City: MADLION HGTS State: MI Zip: 47071 c) Generator's Representative: RAWLY CLEMENT Title: FACILITY HAVAGER Telephone: (10) 583 9300 Fax: (810) 589- 4825 d) Emergency/Information Contact: 3 GARAVANTA Title: REG. AFFINES DIR. Telephone: (810) 583 9300	e) State/Provincial/Local Registration No.:  Generator's EPA Id. No.:  Industry Description/SIC Code:  f) Customer's Name:  SAME  g) Customer's Mailing Address:  City:  State:  Telephone:  Telephone:  Fax:  ()
	E STREAM INFORMATION
a) Name/Description of The Waste: NON - HAZARDOUS FILTER b) Process Generating Waste: LABORATORY WASTE STREAM c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to d) Is this a "Hazardous Waste" as defined by State. Provincial, or local Re If yes, enter the Waste Identification Number if one has been assigned e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Yes No If yes, enter Waste Identification Number: f) Recommended personal protection equipment and special handling pro-	PRES SUICE  D'AL CLEAVELS  Pazardous waste? The Moon of treatment.  Equilations? The Moon of the Moon
g) Anticipated Volume:	☑ Cubic Yards □ Tons □ Gallons □ Cubic Meters □ Tonnes(metric)
Other Per: Year Month Week Day To be transported in: XBulk Drums (type/size)  h) Is a representative sample included? Yes No	One Time Other Other
3. WASTE F	PROPERTIES AT 72°F
a) Physical State:  Solid Semi-solid Powder Liquid Combination b) Layers: Single-layered Bi-layered Multi-layered c) Colors(s): Describe	e) Density Range:
d) Odor:  Describe  None   Mild   Strong	g) pH: □ ≤2 □ 2.1 - 5.0 ▼ 5.1 - 9.0 □ 9.1 - 12.4 □ ≥ 12.5 □ N/A □ N/D





# ANNUAL RENEWAL PROCESS KNOWLEDGE CERTIFICATION

Generator hereby certifies that the process generating the waste identified by BFI Waste Code MT 1 687 19704912 2 FFIS as described in the BFI Waste Characterization Data form (WCD) number AB 55 796 remains identical to what it was at the time the waste was originally characterized and everything in the WCD, including any and all change forms, remains the same. If the Generator's process changes in the future, it will notify BFI prior to shipping any waste from such changed process and will not ship any such waste until all necessary analytical data or other documentation is submitted to BFI for review and BFI approves the waste for management.

Generator I	Octores Lemb Print Name	Signature	n se Purchasin's Tille Asent
PARK	tal Amentan	(810)	583 - 9300
		To	elephone Number
FILTE	n PRESS SL	\0 /	589 - 4825 ax Number

To be signed by Generator's Authorized Representative who has responsibility for the process and for waste.

arpkc.org



12610 Newburgh Road Livonia, Michigan 48150 (313)591-1855, Fax (313)591-3331

#### ANALYTICAL REPORT

October 23, 1998

Henkel Corporation 32100 Stephenson Highway Madison Hgts., MI 48071

Project Name: n/a Project Number: n/a MEI Report Number: 5109 MEI Sample Number: 015649

Date Submitted: 10/05/98 Purchase Order: P102183

Sample Description: Filter Press Sludge

Collection Date: 09/30/98

Parameters	Results	Units	MDL	Method	Analysis Date	Analyst
10 MDNR METALS by TCLP						
Arsenic	< 0.100	ppm	0.100	7060	10/13/98	MLC
rium	<20.00	ppm	20.00	7080	10/13/98	MLC
Jadmium	<0.100	ppm	0.100	7130	10/13/98	MLC
Chromium	<2.00	ppm	1.00	7190	10/13/98	MLC
Copper	<2.50	ppm	2.50	7210	10/13/98	MLC
Lead	<1.00	ppm	1.00	7420	10/13/98	, MLC
Mercury	<0.050	ppm	0.200	7470	10/13/98	MLC
Selenium	<0.500	ppm	0.500	7740	10/13/98	MLC
Silver	<0.500	ppm	0.500	7760	10/13/98	MLC
Zinc	<2.00	ppm	2.00	7950	10/13/98	MLC
RCRA CHARACTERISTICS ANALYSIS						
Ignitibility	>140° F	Deg. F	n/a	1010	10/09/98	MLC
Corrositivity pH Units	8.0	s. u.	n/a	9045	10/09/98	MLC
As Cyanide	ND	mg/L	0.01	9010	10/09/98	MLC
As Sulfide	13.4	mg/L	0.01	9030	10/09/98	MLC
TCLP SEMI - VOLATILES FRACTION			•			
Hexachlorobenzene	ND	mq/L	0.10	8270	10/22/98	JDM
2,4-Dinitrotoluene	ND	mg/L	0.10	8270	10/22/98	JDM
Hexachlorobutadiene	ND	mg/L	0.10	8270	10/22/98	JDM
Nitrobenzene	ND .	mg/L	0.10	8270	10/22/98	JDM
2,4,6-Trichlorophenol	ND	mq/L	0.10	8270	10/22/98	JDM
Hexachloroethane	ND	mg/L	0.10	8270	10/22/98	JDM
Pyridine	ND	mg/L	0.10	8270	10/22/98	JDM
Pentachlorophenol	ND	mg/L	0.10	8270	10/22/98	JDM
o-Cresol	ND	mg/L :	0.10	8270	10/22/98	JDM
m-Cresol	ND	mg/L	0.10	8270	10/22/98	JDM
p-Cresol	ND	mq/L	0.10	8270	10/22/98	JDM
4,5-Trichlorophenol	ИĎ	mg/L	0.10	8270	10/22/98	JDM



12610 Newburgh Road Livonia, Michigan 48150 (313)591-1855, Fax (313)591-3331

#### ANALYTICAL REPORT

October 23, 1998

Henkel Corporation 32100 Stephenson Highway Madison Hgts., MI 48071

Project Name: n/a Project Number: n/a MEI Report Number: 5109 MEI Sample Number: 015649

Date Submitted: 10/05/98 Purchase Order: P102183

Sample Description: Filter Press Sludge

Collection Date: 09/30/98

					Analysis	•
Parameters	Results	Units	MDL	Method	Date	Analyst
TCLP VOLATILE FRACTION				-		
Vinyl chloride	ND	mg/L	0.025	8240	10/22/98	JDM
zene	ND	mg/L	0.025	8240	10/22/98	JDM
carbon tetrachloride	ND	mg/L	0.025	8240	10/22/98	JDM
1,2-Dichloroethane	ND	mg/L	0.025	8240	10/22/98	JDM
Trichloroethylene	ND	mg/L	0.025	8240	10/22/98	JDM
1,1-Dichloroethylene	ND	mg/L	0.025	8240	10/22/98	JDM
Tetrachloroethylene	NĎ	mg/L	0.025	8240	10/22/98	JDM
Chloroform	ND	mg/L	0.025	8240	10/22/98	JDM
1,4-Dichlorobenzene	ND	mq/L	0.025	8240	10/22/98	JDM
Chlorobenzene	ND	mg/L	0.025	8240	10/22/98	JDM
Methyl ethyl ketone	ND	mg/L	0.025	8240	10/22/98	JDM
TCLP Pesticides						•
Chlordane	ND	ppm	0.040	8080	10/22/98	МН
Endrin	ND	ppm .	0.004	8080	10/22/98	MH
Heptachlor	ND	ppm	0.004	8080	10/22/98	MH
Heptachlor epoxide	ND	ppm	0.004	8080	10/22/98	MH
Lindane	ND	ppm	0.004	8080	10/22/98	MH
Methoxychlor	ND	ppm	0.004	8080	10/22/98	MH
Toxaphene	ND	ppm	0.040	8080	10/22/98	MH
TCLP Herbicides		-				
· · · · · · · · · · · · · · · · · · ·	ND	<b>.</b>	0.05			
2,4-D	ND	ppm	0.05	8150	10/22/98	SAM
2,4,5-TP	ND	ppm	0.05	8150	10/22/98	SAM

Reviewed By:

HAZARDOUS WASTE INSPECTION DEQ Facility Location Address: City: ___ Zip: County Name: PROCESS WASTE'S GENERATED FROM Routine Reason for the Inspection: Follow-up Complaint

(if yes send a copy of this cover sheet to SWQD)

Per mitted

Is the facility subject to air emission standards for process vents managing hazardous waste with organic concentrations of at least 10 ppmw? If yes, circle the type of

Does the facility discharge a process wastewater to the local POTW that would otherwise be a RCRA regulated hazardous waste?

to ppinw? If yes, circle the type of

eration(s): distillation fractionation thin-film evaporation solvent extraction air or stream stripping (if yes send a copy of this cover sheet to AQD)

(rev. 11/16/95 - EAB - z\cover.new)

Mark- well send uner waste & lamp handout.

#### MANIFEST REVIEW LOG

MANIFEST NUMBER	G2   LB	DATE	WASTE CO	DES  QUANTITY	• ·
3/199 (Sugar	d 4/99				•
11 Doo 2.	<u> 1809</u> 1	1 <u>D26/</u> 1	309	0/3/3	55.5
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GENERATOR INSPECTION FORM

### Part 3 Rule*  ### BE	x r		GENERATOR INSTRUCTION FORM		
### SOURCE HOW MUCH  ### SOURC	Facility's Na	ame	Menne		Part 3 Rules
abhreviated  **FACILITY COMPLIANCE REQUIRED IN ALL AREAS** NI - Not Inspected N/A - Not Applicable  **YES NO NI N/A*  **WASTE DETERMINATION (Rule 302: 40 CFR 262.11)  **B. Determined if waste vireams are bazardous waste? (Rule 307: 40 CFR 262.11)  **B. Determined if waste vireams are bazardous waste? (Rule 307: 40 CFR 262.11)  **B. Determined if waste vireams are bazardous waste? (Rule 307: 40 CFR 262.11)  **B. Determined if waste vireams are bazardous waste? (Rule 307: 40 CFR 262.11)  **B. Determined if waste vireams are bazardous waste? (Rule 307: 40 CFR 262.11)  **B. Determined if waste vireams are bazardous waste? (Rule 307: 40 CFR 262.11)  **B. Determined if waste vireams are bazardous waste? (Rule 307: 40 CFR 262.12)  **B. Determined waste vireams are bazardous waste? (Rule 307: 40 CFR 262.12)  **B. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)  **B. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)  **B. Manifests kept for the past 3 years? (Rule 307: 40 CFR 262.20)  **B. Manifests kept for the past 3 years? (Rule 307: 40 CFR 262.20)  **B. Manifests kept for the past 3 years? (Rule 304: 40 CFR 262.20)  **B. Manifests kept for the past 3 years? (Rule 304: 40 CFR 262.20)  **B. Manifests kept for the generator (Rule 304: 40 CFR 262.20)  **B. Manifests kept for the generator (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter waster properly licensed under Act 451. Part 111? (Rule 304: 40 CFR 262.20)  **D. North of the transporter	ate	ID#			1994 PA 451
abhreviated  **FACILITY COMPLIANCE REQUIRED IN ALL AREAS** NI - Not Inspected N/A - Not Applicable  **YES NO NI N/A*  **WASTE DETERMINATION (Rule 302: 40 CFR 262.11)  **B. Determined if waste vireams are bazardous waste? (Rule 307: 40 CFR 262.11)  **B. Determined if waste vireams are bazardous waste? (Rule 307: 40 CFR 262.11)  **B. Determined if waste vireams are bazardous waste? (Rule 307: 40 CFR 262.11)  **B. Determined if waste vireams are bazardous waste? (Rule 307: 40 CFR 262.11)  **B. Determined if waste vireams are bazardous waste? (Rule 307: 40 CFR 262.11)  **B. Determined if waste vireams are bazardous waste? (Rule 307: 40 CFR 262.11)  **B. Determined if waste vireams are bazardous waste? (Rule 307: 40 CFR 262.12)  **B. Determined waste vireams are bazardous waste? (Rule 307: 40 CFR 262.12)  **B. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)  **B. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)  **B. Manifests kept for the past 3 years? (Rule 307: 40 CFR 262.20)  **B. Manifests kept for the past 3 years? (Rule 307: 40 CFR 262.20)  **B. Manifests kept for the past 3 years? (Rule 304: 40 CFR 262.20)  **B. Manifests kept for the past 3 years? (Rule 304: 40 CFR 262.20)  **B. Manifests kept for the generator (Rule 304: 40 CFR 262.20)  **B. Manifests kept for the generator (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter. (Rule 304: 40 CFR 262.20)  **D. North of the transporter waster properly licensed under Act 451. Part 111? (Rule 304: 40 CFR 262.20)  **D. North of the transporter					
### TACHITY COMPLIANCE REQUIRED IN ALL AREAS  NI - Not Inspected  NA - Not Applicable    YES NO NI N/A	HAZ		SOURCE		HOW MUCH
### PACILITY COMPLIANCE REQUIRED IN ALL AREAS NI - Not Inspected N/A - Not Applicable    YES NO NI N/A			0	$\rightarrow$	
### PACILITY COMPLIANCE REQUIRED IN ALL AREAS NI - Not Inspected N/A - Not Applicable    YES NO NI N/A			0 N(	$\longrightarrow$	
### PACILITY COMPLIANCE REQUIRED IN ALL AREAS NI - Not Inspected N/A - Not Applicable    YES NO NI N/A			<b>N</b>	-	1
### PACILITY COMPLIANCE REQUIRED IN ALL AREAS NI - Not Inspected NIA - Not Applicable    YES NO NI N/A				+	
### PACILITY COMPLIANCE REQUIRED IN ALL AREAS NI - Not Inspected NIA - Not Applicable    YES NO NI N/A	(nev 01/29/97 - EA	R)			=
### WASTE DETERMINATION (Rule 302: 40 CFR 262.11)  ### Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)  ### Copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(e))  ### Determined if waste streams are hazardous waste? (Rule 307(1): 40 CFR 262.40(e))  ### Devaluated waste when changes in materials or process? (Rule 302(3))  ### DENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)  ### DENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)  ### DENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)  ### DENTIFICATION NUMBER (Rule 304: 40 CFR 262.12)  ### DENTIFICATION NUMBER (Rule 304: 40 CFR 262.20)  ### DENTIFIC					
### WASTE DETERMINATION (Rule 302: 40 CFR 262.11)  ### Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)  ### Copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(e))  ### Determined if waste streams are hazardous waste? (Rule 307(1): 40 CFR 262.40(e))  ### Devaluated waste when changes in materials or process? (Rule 302(3))  ### DENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)  ### DENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)  ### DENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)  ### DENTIFICATION NUMBER (Rule 304: 40 CFR 262.12)  ### DENTIFICATION NUMBER (Rule 304: 40 CFR 262.20)  ### DENTIFIC			-		YES NO NI N/A
B. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)  30 Copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))  31 Copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))  32 Copy of waste evaluated waste when changes in materials or process? (Rule 302(3))  33 Copy of waste evaluated waste when changes in materials or process? (Rule 302(3))  34 CFR 262.12)  35 Copies of the manifest readily available for review & inspection (matched)? (Section 11138(1)(f))  46 Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))  47 Copies of the manifest readily available for review & inspection (matched)? (Section 11138(1)(f))  48 Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a)), contain the following?  49 Manifests kept for the past 3 years? (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?  50 MR  50 Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))  51 Copies of the manifest readily available for review & inspection (matched)? (Section 11138(1)(f))  52 Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))  53 Manifest document number. (Rule 304(2)(b): 40 CFR 262.20(a))  54 Manifests kept for the past 3 years? (Rule 304(2)(b): 40 CFR 262.20(a))  55 Manifest document number. (Rule 304(2)(c): 40 CFR 262.20(a))  56 MR  57 MR  58 Manifest document number. (Rule 304(2)(b): 40 CFR 262.20(a))  57 MR  58 MR  58 MR  59 MR  50		WY A COMPANY	A PRINCIPAL (P. L. 2002, 40 CFP 2/2 11)	Į.	120 110 1111
a) Copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(e)) CALLY F. L.		WASTE	DETERMINATION (Rule 302: 40 CFR 262.11)		
B) Re-evaluated waste when changes in materials or process? (Rule 302(3))  (C) SALA GGR NI NI/A  IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)  (B) Hazardous waste when changes in materials or process? (Rule 303: 40 CFR 262.12)  (C) SALA GGR NI NI/A  MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)  (B) NI NI/A  (A) Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))  (B) Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?  (B) Manifests, prepared by the generator (Rule 304(2)(a): 40 CFR 262.20(a))  (C) Name & ID # of the transporter. (Rule 304(2)(c): 40 CFR 262.20(a))  (C) Name & ID # of TSDF. (Rule 304(2)(c): 40 CFR 262.20(a))  (E) DOT description of waste(s). (Rule 304(2)(e): 40 CFR 262.20(a))  (E) DOT description of waste (s). (Rule 304(2)(e): 40 CFR 262.20(a))  (E) Hazardous waste number of the wastes. (Rule 304(2)(f): 40 CFR 262.20(a))  (E) Hazardous waste number of the wastes. (Rule 304(2)(f): 40 CFR 262.20(a))  (E) Hazardous waste number of the wastes. (Rule 304(2)(f): 40 CFR 262.20(a))  (E) Hazardous waste number of the wastes. (Rule 304(2)(f): 40 CFR 262.20(a))  (E) Hazardous waste number of the wastes. (Rule 304(2)(f): 40 CFR 262.20(a))  (E) Hazardous waste number of the wastes. (Rule 304(2)(f): 40 CFR 262.20(a))  (E) Hazardous waste number of the wastes. (Rule 304(2)(f): 40 CFR 262.20(a))  (E) NI NI/A  (B) Hazardous waste number of the wastes. (Rule 304(2)(f): 40 CFR 262.20(a))  (C) No Hazardous waste number of the wastes. (Rule 304(2)(f): 40 CFR 262.20(a))  (E) NI NI/A  (E) Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  (E) NI NI/A  (E) Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  (E) NI NI/A  (E) Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  (E) NI NI/A  (	II. Dete	ermined if waste streams are hazardous waste?	? (Rule 302: 40 CFR 262.11)	GGR	NI N/A
IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)  2a. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)  3b. Copies of the manifest readily available for review & inspection (matched)? (Section 11138(1)(f))  4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))  5b. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?  5c. Manifests, prepared by the generator (Rule 304(2)(a): 40 CFR 262.20(a)), contain the following?  5c. Manifests document number. (Rule 304(2)(a): 40 CFR 262.20(a))  5c. Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))  5c. Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))  5c. Manifest document number. (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest document number. (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest document number. (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest document number. (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest document number. (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest document number. (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest document number. (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest Description of waste(s). (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest Description of waste(s). (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest Description of waste(s). (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest Description of waste(s). (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest Description of waste(s). (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest Description of waste(s). (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest Description of waste(s). (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest Description of waste(s). (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest Description of waste(s). (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest Description of waste(s). (Rule 304(2)(c): 40 CFR 262.20(a))  5c. Manifest Description of waste(s). (Rule 304(2)(c): 40 CFR 262.20(a))  6c. Manifest Description of waste(s). (Rule 304(2)(c): 40 CF	48)	Copy of waste evaluation on-site 3 years? (Re	ule 307(1): 40 CFR 262.40(c)) only Fike Press lidg	€ GRR	[] NI N/A
MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)  28. Copies of the manifest readily available for review & inspection (matched)? (Section 11138(1)(f))  4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))  52. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?  53. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?  54. Manifests, prepared by the generator (Rule 304(2)(a): 40 CFR 262.20(a))  55. Manifests, prepared by the generator (Rule 304(2)(a): 40 CFR 262.20(a))  56. Manifests document number. (Rule 304(2)(a): 40 CFR 262.20(a))  57. Manifests document number. (Rule 304(2)(c): 40 CFR 262.20(a))  58. Copies of the manifests, prepared by the generator (Rule 304(2)(c): 40 CFR 262.20(a))  59. Manifests, prepared by the generator (Rule 304(2)(c): 40 CFR 262.20(a))  50. Manifests document number. (Rule 304(2)(c): 40 CFR 262.20(a))  50. Manifests, prepared by the generator (Rule 304(2)(c): 40 CFR 262.20(a))  50. Manifests document number. (Rule 304(2)(c): 40 CFR 262.20(a))  50. Manifests (Daniel States)  50. Manifests (Daniel States)  50. Manifests (Daniel States)  60. Manifests (Daniel	b) :	Re-evaluated waste when changes in materials	s or process? (Rule 302(3)) Ca. Said	GGR	M NI N/A
MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)  28. Copies of the manifest readily available for review & inspection (matched)? (Section 11138(1)(f))  4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))  53. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?  54. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?  55. Manifests, prepared by the generator (Rule 304(2)(a): 40 CFR 262.20(a))  56. Manifests document number. (Rule 304(2)(a): 40 CFR 262.20(a))  57. Manifests document number. (Rule 304(2)(c): 40 CFR 262.20(a))  58. Copies of the manifests, prepared by the generator (Rule 304(2)(c): 40 CFR 262.20(a))  58. Manifests, prepared by the generator (Rule 304(2)(c): 40 CFR 262.20(a))  59. Manifests, prepared by the generator (Rule 304(2)(c): 40 CFR 262.20(a))  50. Manifests document number. (Rule 304(2)(c): 40 CFR 262.20(a))  50. Manifests, prepared by the generator (Rule 304(2)(c): 40 CFR 262.20(a))  50. Manifests (Daniel Copies (Rule 304(2)(c): 40 CFR 262.20(a))  50. Manifests (Daniel Copies (Rule 304(2)(c): 40 CFR 262.20(a))  50. Manifests (Rule 304(2)(c): 40 CFR 262.20(a))  60. Manifests (Rule 304(4)(c): 40 CFR 2		IDENTIF	FICATION NUMBER (Rule 303: 40 CFR 262.12)		
MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)  28. Copies of the manifest readily available for review & inspection (matched)? (Section 11138(1)(f))  4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))  53. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?  63. Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))  64. Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))  65. Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))  66. MIR  67. NI N/A  68. Manifest document number. (Rule 304(2)(c): 40 CFR 262.20(a))  66. MIR  67. NI N/A  69. Manifest document number. (Rule 304(2)(c): 40 CFR 262.20(a))  67. MIR  68. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  70. Is the transporter used properly licensed under Act 451, Part 1117 (Rule 304(1)(c))  71. Is the transporter used properly licensed under Act 451, Part 1117 (Rule 304(1)(c))  72. Is the transporter used properly licensed under Act 451, Part 1117 (Rule 304(1)(c))  73. Reportable exceptions. (Rule 304(2): 40 CFR 262.20(a))  74. Note: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(for g).  75. Reportable exceptions. (Rule 304(2): 40 CFR 262.20(a))  76. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  77. Supportable exceptions. (Rule 304(2): 40 CFR 262.20(a))  88. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  99. Reportable exceptions. (Rule 304(2): 40 CFR 262.20(a))  90. Reportable exceptions. (Rule 304(2): 40 CFR 262.20(a))  90. Reportable exceptions. (Rule 304(2): 40 CFR 262.20(a))	Mas Has			GGR	NI N/A
28. Copies of the manifest readily available for review & inspection (matched)? (Section 11138(1)(f))  4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))  5. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?  5. Manifests document number. (Rule 304(2)(a): 40 CFR 262.20(a))  5. Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))  6. MR  6. Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))  6. MR  6. MI N/A  7. Is the transporter used properly licensed under Act 451, Part 111? (Rule 304(1)(c))  8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  9. Reportable exceptions. (Rule 304(2): 40 CFR 262.20(a))				1-380000	
4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))  52. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?  63. Manifests document number. (Rule 304(2)(a): 40 CFR 262.20(a))  64. Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))  65. Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))  66. MR [1] NI N/A  67. Name & ID # of the transporter. (Rule 304(2)(c): 40 CFR 262.20(a))  66. MR [1] NI N/A  67. In In N/A  68. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  79. Reportable exceptions. (Rule 304(2): 40 CFR 262.20(a))  80. MR [1] NI N/A  60. Manifests kept for the past 3 years? (Rule 304(2))(f): 40 CFR 262.20(a))  60. MR [1] NI N/A  60. Manifests kept for the past 3 years? (Rule 304(2)(f): 40 CFR 262.20(a))  60. MR [1] NI N/A  61. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  60. MR [1] NI N/A  61. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  60. MR [1] NI N/A  61. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  60. MR [1] NI N/A  61. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  60. MR [1] NI N/A  61. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  60. MR [1] NI N/A  61. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  60. MR [1] NI N/A  61. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  60. MR [1] NI N/A  61. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  60. MR [1] NI N/A  61. Submitted copy of manifests to director no later than 10 days after month shipment wa		MANIFE	ST REQUIREMENTS (Rule 304: 40 CFR 262.20)		
85. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?  a) Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))  b) Generator's name, address, phone & ID # (Rule 304(2)(b): 40 CFR 262.20(a))  c) Name & ID # of the transporter. (Rule 304(2)(c): 40 CFR 262.20(a))  d) Name, address & ID # of TSDF. (Rule 304(2)(d): 40 CFR 262.20(a))  e) DOT description of waste(s). (Rule 304(2)(e): 40 CFR 262.20(b)&(c))*  f) Quantity of waste, type & # of containers. (Rule 304(2)(f): 40 CFR 262.20(a))  g) Hazardous waste number of the wastes. (Rule 304(2)(g): 40 CFR 262.20(a))  g) Hazardous waste number of the wastes. (Rule 304(2)(g): 40 CFR 262.20(a))  g) Hazardous waste number of the wastes of acceptance? (Rule 304(4)(a)&(b):40 CFR 262.23(a)(1)&(2))  g) GMR [I] NI N/A  g) Hazardous waste number of the wastes of acceptance? (Rule 304(4)(a)&(b):40 CFR 262.23(a)(1)&(2))  g) GMR [I] NI N/A  46. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  g) GMR [I] NI N/A  NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(f) or g).  8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  g) GMR [I] NI N/A  9. Reportable exceptions. (Rule 308(3): 40 CFR 262.20(a))  a) Number of manifests generator HASN'T receive signed copy from TSD w/in 35 days.  GRR	33. Cop	pies of the manifest readily available for review	w & inspection (matched)? (Section 11138(1)(f))	GMR	NI N/A
a) Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))  b) Generator's name, address, phone & ID # (Rule 304(2)(b): 40 CFR 262.20(a))  c) Name & ID # of the transporter. (Rule 304(2)(c): 40 CFR 262.20(a))  d) Name, address & ID # of TSDF. (Rule 304(2)(d): 40 CFR 262.20(b)&(c))  e) DOT description of waste(s). (Rule 304(2)(e): 40 CFR 262.20(a))  gMR [J] NI N/A  e) DOT description of waste, type & # of containers. (Rule 304(2)(f): 40 CFR 262.20(a))  gMR [J] NI N/A  g) Hazardous waste number of the wastes. (Rule 304(2)(f): 40 CFR 262.20(a))  gMR [J] NI N/A  h) Generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b):40 CFR 262.23(a)(1)&(2))  gMR [J] NI N/A  4. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  gMR [J] NI N/A  7. Is the transporter used properly licensed under Act 451, Part 111? (Rule 304(1)(c))  gPT [J] NI N/A  NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(for g).  8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  gMR [J] NI N/A  9. Reportable exceptions. (Rule 308(3): 40 CFR 262.20(a))  GMR [J] NI N/A	4. Mai	nifests kept for the past 3 years? (Rule 307(3	3): 40 CFR 262.40(a))	GMR	NI N/A
b) Generator's name, address, phone & ID # (Rule 304(2)(b): 40 CFR 262.20(a))  c) Name & ID # of the transporter. (Rule 304(2)(c): 40 CFR 262.20(a))  d) Name, address & ID # of TSDF. (Rule 304(2)(d): 40 CFR 262.20(b)&(c))  e) DOT description of waste(s). (Rule 304(2)(e): 40 CFR 262.20(a))  f) Quantity of waste, type & # of containers. (Rule 304(2)(f): 40 CFR 262.20(a))  gMR  [] NI N/A  g) Hazardous waste number of the wastes. (Rule 304(2)(g): 40 CFR 262.20(a))  gMR  [] NI N/A  h) Generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b):40 CFR 262.23(a)(1)&(2))  gMR  [] NI N/A  45. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  GMR  [] NI N/A  7. Is the transporter used properly licensed under Act 451, Part 111? (Rule 304(1)(c))  ROTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(f or g).  8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  gMR  [] NI N/A  9. Reportable exceptions. (Rule 304(2): 40 CFR 262.20(a))  GMR  [] NI N/A	55. Mai	nifests, prepared by the generator (Rule 304(1	)(a): 40 CFR 262.20(a)), contain the following?	GMR	NI N/A
c) Name & ID # of the transporter. (Rule 304(2)(c): 40 CFR 262.20(a))  d) Name, address & ID # of TSDF. (Rule 304(2)(d): 40 CFR 262.20(b)&(c))  e) DOT description of waste(s). (Rule 304(2)(e): 40 CFR 262.20(a))  gMR [I] NI N/A  e) DOT description of waste, type & # of containers. (Rule 304(2)(f): 40 CFR 262.20(a))  gMR [I] NI N/A  g) Hazardous waste number of the wastes. (Rule 304(2)(f): 40 CFR 262.20(a))  h) Generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b):40 CFR 262.23(a)(1)&(2))  gMR [I] NI N/A  submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  T. Is the transporter used properly licensed under Act 451, Part 111? (Rule 304(1)(c))  NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(f or g).  8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  gMR [I] NI N/A  9. Reportable exceptions. (Rule 308(3): 40 CFR 262.20(a))  GMR [I] NI N/A	a)	Manifest document number. (Rule 304(2)(a)	: 40 CFR 262.20(a))	GMR	[4] NI N/A
d) Name, address & ID # of TSDF. (Rule 304(2)(d): 40 CFR 262.20(b)&(c)) GMR NI N/A  e) DOT description of waste(s). (Rule 304(2)(e): 40 CFR 262.20(a)) GMR NI N/A  f) Quantity of waste, type & # of containers. (Rule 304(2)(f): 40 CFR 262.20(a)) GMR NI N/A  g) Hazardous waste number of the wastes. (Rule 304(2)g): 40 CFR 262.20(a)) GMR NI N/A  h) Generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b):40 CFR 262.23(a)(1)&(2)) GMR NI N/A  6. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d)) GMR NI N/A  7. Is the transporter used properly licensed under Act 451, Part 111? (Rule 304(1)(c)) GPT NI N/A  NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(f or g).  8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  9. Reportable exceptions. (Rule 308(3): 40 CFR 262.42)  a) Number of manifests generator HASN'T receive signed copy from TSD w/in 35 days. GRR	b)	Generator's name, address, phone & ID # (R	ule 304(2)(b): 40 CFR 262.20(a))	GMR	NI N/A
e) DOT description of waste(s). (Rule 304(2)(e): 40 CFR 262.20(a))  f) Quantity of waste, type & # of containers. (Rule 304(2)(f): 40 CFR 262.20(a))  gMR [] NI N/A  g) Hazardous waste number of the wastes. (Rule 304(2)g): 40 CFR 262.20(a))  h) Generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b):40 CFR 262.23(a)(1)&(2))  GMR [] NI N/A  6. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  GMR [] NI N/A  7. Is the transporter used properly licensed under Act 451, Part 111? (Rule 304(1)(c))  GPT [] NI N/A  NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(f or g).  8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  GMR [] NI N/A  9. Reportable exceptions. (Rule 308(3): 40 CFR 262.42)  a) Number of manifests generator HASN'T receive signed copy from TSD w/in 35 days.  GRR [] A / A	c)	Name & ID # of the transporter. (Rule 304(2	2)(c): 40 CFR 262.20(a))	GMR	[U] NI N/A
f) Quantity of waste, type & # of containers. (Rule 304(2)(f): 40 CFR 262.20(a))  g) Hazardous waste number of the wastes. (Rule 304(2)g): 40 CFR 262.20(a))  h) Generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b):40 CFR 262.23(a)(1)&(2))  Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(f or g).  Submitted copy of manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  Reportable exceptions. (Rule 308(3): 40 CFR 262.42)  a) Number of manifests generator HASN'T receive signed copy from TSD w/in 35 days.  GRR  A A A A A A A A A A A A A A A A A A	d)	Name, address & ID # of TSDF. (Rule 304)	(2)(d): 40 CFR 262.20(b)&(c)}	GMR	NI N/A
g) Hazardous waste number of the wastes. (Rule 304(2)g): 40 CFR 262.20(a))  h) Generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b):40 CFR 262.23(a)(1)&(2))  Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  T. Is the transporter used properly licensed under Act 451, Part 111? (Rule 304(1)(c))  GPT IN N/A  NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(f or g).  8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  GMR IN N/A  N/A  P. Reportable exceptions. (Rule 308(3): 40 CFR 262.20(a))  GMR IN N/A  Submitted copy of manifests generator HASN'T receive signed copy from TSD w/in 35 days.  GRR IN N/A  GRR IN N/A  GRR IN N/A	e)	DOT description of waste(s). (Rule 304(2)(e	e): 40 CFR 262.20(a))	GMR	NI N/A
h) Generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b):40 CFR 262.23(a)(1)&(2)) GMR NI N/A  Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d)) GMR NI N/A  7. Is the transporter used properly licensed under Act 451, Part 111? (Rule 304(1)(c)) GPT NI N/A  NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(f or g).  8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a)) GMR NI N/A  9. Reportable exceptions. (Rule 308(3): 40 CFR 262.42)  a) Number of manifests generator HASN'T receive signed copy from TSD w/in 35 days. GRR	f)	Quantity of waste, type & # of containers. (F	Rule 304(2)(f): 40 CFR 262.20(a))	GMR	NI N/A
h) Generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b):40 CFR 262.23(a)(1)&(2)) GMR NI N/A  Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d)) GMR NI N/A  7. Is the transporter used properly licensed under Act 451, Part 111? (Rule 304(1)(c)) GPT NI N/A  NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(f or g).  8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a)) GMR NI N/A  9. Reportable exceptions. (Rule 308(3): 40 CFR 262.42)  a) Number of manifests generator HASN'T receive signed copy from TSD w/in 35 days. GRR	g)	Hazardous waste number of the wastes. (Ru	le 304(2)g): 40 CFR 262.20(a))	GMR	NI N/A
Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))  7. Is the transporter used properly licensed under Act 451, Part 111? (Rule 304(1)(c))  8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  9. Reportable exceptions. (Rule 308(3): 40 CFR 262.42)  a) Number of manifests generator HASN'T receive signed copy from TSD w/in 35 days.  GMR NI N/A  GMR NI N/A  GMR NI N/A  GRR A			5	GMR	
7. Is the transporter used properly licensed under Act 451, Part 111? (Rule 304(1)(c))  NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(f or g).  8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  9. Reportable exceptions. (Rule 308(3): 40 CFR 262.42)  a) Number of manifests generator HASN'T receive signed copy from TSD w/in 35 days.  GRR					
NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(f or g).  8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  9. Reportable exceptions. (Rule 308(3): 40 CFR 262.42)  a) Number of manifests generator HASN'T receive signed copy from TSD w/in 35 days.  GRR				GPT	
8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))  9. Reportable exceptions. (Rule 308(3): 40 CFR 262.42)  a) Number of manifests generator HASN'T receive signed copy from TSD w/in 35 days.  GRR	Name of the last		V W	g).	
9. Reportable exceptions. (Rule 308(3): 40 CFR 262.42)  a) Number of manifests generator HASN'T receive signed copy from TSD w/in 35 days.  GRR		A. A			NI N/A
a) Number of manifests generator <u>HASN'T</u> receive signed copy from TSD w/in 35 days.  GRR  A/A		1.4		CAME	A10 A1/44
01/0				GRR	NA
		AND		1502400470	NA

,	( <del></del>	
	YES N	O NI N/A
10. Facility have written program to reduce volume/toxicity/recycle wastes? (Rule 304(2)(I):40 CFR 262.20(a)) GMR		NI N/A
OR	A	
Facility discuss program in place to reduce volume/toxicity/recycle of wastes? (Rule 304(2)(I): 40 CFR 262.20(a)) GMR	M	NI N/A
WASTE ANALYSIS AND RECORDKEEPING (40 CFR 268.7)		
12. Did the generator determine if the waste is restricted from land disposal? (40 CFR 268.7(a))	•	
All listed wastes? GLB	[W_	NI N/A
All characteristic wastes?  GEB	<u>Lv</u>	NI N/A
NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D000000000000000000000000000000000000		
13. If restricted waste exceeds treatment standards or prohibitions did notice go w/ each shipment? (40 CFR 268.7(a)(1)) GLB	[]	NI N/A
OR	Season and the season of the s	history and the state of the st
14. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with each shipment? (40 CFR 268.7(a)(2))		NI N/A
OR		4
15. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with each shipment? (40 CFR 268.7(a)(3))  GLB		NI N/A
OR	**************************************	
16. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go w/ each shipment? (40 CFR 268.7(a)(8))		NI N/A
17. Did the notice include: (40 CFR 268.7(a)(1)(I-v) or 268.7(a)(2)(I)(A-D) or 268.7(a)(3)(I-iv)		
a) EPA hazardous waste #?	[]	NI N/A
b) If wastewater or non-wastewater as defined in 268.2(d&f)?	[]	NI N/A
c) Subcategory of the waste (such as D003 reactive cyanide) if applicable?	<u>U</u>	NI N/A
d) Manifest number associated with the shipment?	<u> </u>	NI N/A
e) Waste analysis data, where available?  GLB	[]	NI N/A
f) Waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001 - F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)		NI N/A
UNLESS		
g) Did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (40 CFR 268.7(a)(1)(ii))		NI N/A
h) Underlying hazardous waste constituents (except vanadium and zinc), reasonably be expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? (40 CFR 268 Subpart D & 268.48) GLE		NI N/A
18. Other than notices for waste exceeding treatment standards, did notices include:		
a) If the notice is for shipments that meet the standards does the notice include the certification?	N/	NI N/A
b) If the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	10	NI N/A

mg & Char. of paint felters & light bulls

G	Penergion Increation Form Weekly Jugo Reports Not and als	
~ [6	NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)  NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement subject to alternative treatment standards of 40 CFR 268.45."	
	19. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(5)) GLB	Da Colle NI N/A
Salar	20. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a on-time notice stating same in the facility file? (40 CFR 268.7(a)(6)) GLB	[] NI (N/A)
- 13 L	28. All notices/certifications/demonstrations/other documents retained for 5 years on-site? (40 CFR 268.7(a)(7)) GLB	My V NI N/A
	NOTE: This requirement (268.7(a)(7)) applies to solid waste even when the hazardous waste characteristic is removed prior to excluded from the definition of hazardous waste or solid waste.	disposal or when the waste is
	DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (40 CFR 268.	.3)
Ž	22. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR 268.3(a)) GLB	NI N/A
S S	TREATMENT STANDARDS (40 CFR 268.40)	
<b>,</b>	23. If wastes exceeding treatment standards are mixed, was the most standards selected? (40 CFR 268.40(c))	U NI (NIA)
Ž		
	BIENNIAL REPORT (Rule 308: 40 CFR 262.41)	
14	Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)  GRR	NI N/A
	25. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	NI N/A
The state of the s	PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)	
	Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR 262.30))	co, said observed NI N/A
		[] NI Ñ/A
Leading for	40 CFR 262.30))  27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shipping waster)	co. said_observed_ NI N/A
	40 CFR 262.30))  27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shipping waster off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))	co. said observed co. said observed co. said observed [ ] NI N/A
	40 CFR 262.30))  27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before this pinglivation off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))  28. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document & waste code: 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	co. said observed co. said observed co. said observed [ ] NI N/A
Satelle 1	40 CFR 262.30))  27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required beford shipping) waster off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))  28. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document & waste code; (August 205 (1)(d): 40 CFR 262.32(b))  29. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)  ACCUMULATION TIME (Rule 306: 40 CFR 262.34)	co. said observed co. said observed co. said observed [ ] NI N/A
	40 CFR 262.30))  27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required beford shirping water off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))  28. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document & ware code: 1/2 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))  29. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)  ACCUMULATION TIME (Rule 306: 40 CFR 262.34)  30. If hazardous waste accumulated in containers: (If no, skip to #35)	co. said_ observed
Satelle 1	40 CFR 262.30))  27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required beford shipping) waster off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))  28. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document & waste code; (49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))  29. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)  ACCUMULATION TIME (Rule 306: 40 CFR 262.34)  30. If hazardous waste accumulated in containers: (If no, skip to #35)	co. said_observed
Satelle 1	40 CFR 262.30))  27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before thinping) waster off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))  28. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document (& waste code: 1/2 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))  29. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)  ACCUMULATION TIME (Rule 306: 40 CFR 262.34)  30. If hazardous waste accumulated in containers: (If no, skip to #35)  40 Containers have accumulation date & visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	co. said_ observed
Satelle 1	40 CFR 262.30))  27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shipinal waster off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))  28. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document & waste code (1) 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))  29. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)  ACCUMULATION TIME (Rule 306: 40 CFR 262.34)  30. If hazardous waste accumulated in containers: (If no, skip to #35)  a) Containers have accumulation date & visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))  b) Container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))  GPT	co. said observed
Satelle 1	40 CFR 262.30))  27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shaping waster) off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))  28. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document & wave code: (1) 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))  29. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)  ACCUMULATION TIME (Rule 306: 40 CFR 262.34)  30. If hazardous waste accumulated in containers: (If no, skip to #35)  a) Containers have accumulation date & visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))  b) Container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))  c) Is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	co. said observed
Satelle 1	27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required beford thirping waster off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))  28. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document & waste code; () 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))  29. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)  ACCUMULATION TIME (Rule 306: 40 CFR 262.34)  30. If hazardous waste accumulated in containers: (If no, skip to #35)  a) Containers have accumulation date & visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))  b) Container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))  c) Is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))  d) Has more than 90 days elapsed since date marked? (Rule 306(1)  **Outline of the property of the p	co. said_observed
120 - Brown Satelit 1	40 CFR 262.30))  27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before thinping waster off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))  28. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document as wastered code; (1) 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))  29. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)  ACCUMULATION TIME (Rule 306: 40 CFR 262.34)  30. If hazardous waste accumulated in containers: (If no, skip to #35)  a) Containers have accumulation date & visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))  b) Container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))  c) Is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))  40 Has more than 90 days elapsed since date marked? (Rule 306(1)  UNLESS	co. said_observed
Satelle 1	40 CFR 262.30))  27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before stabling the off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))  28. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document & waste codes (1) 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))  29. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)  ACCUMULATION TIME (Rule 306: 40 CFR 262.34)  30. If hazardous waste accumulated in containers: (If no, skip to #35)  a) Containers have accumulation date & visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))  b) Container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))  c) Is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))  d) Has more than 90 days elapsed since date marked? (Rule 306(1)  UNLESS  e) The generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))  GPT	co. said_observed_NI N/A  co. said_observed_NI N/A  co. said_observed_ NI N/A
120 - Brown Satelit 1	40 CFR 262.30))  27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required beford shippingly along off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))  28. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document (Rule 305(1)(d): 40 CFR 262.32(b))  29. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)  ACCUMULATION TIME (Rule 306: 40 CFR 262.34)  30. If hazardous waste accumulated in containers: (If no, skip to #35)  a) Containers have accumulation date & visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))  b) Container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))  c) Is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))  d) Has more than 90 days elapsed since date marked? (Rule 306(1)  UNLESS  e) The generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(a)(1).	co. said_ observed

Generator Inspection Form (orl ) w/ no takel - Mafrice of to were
Drom who wate codes Percheto YES NO NI N/A
Containers handled/stored in a way which may rupture it or cause leaks? (265.173(b)
Ignitable & reactive wastes stored 15 meters (50 feet) from property line? (265.176)
Are containers inspected weekly for leaks and defects? (265.174)  GMC [] NI N/A
Did the generator document the inspections in 30(k)? (Rule 306(1)(a)(I))  GMC [] VNI N/A
Inspection documents maintained on-site 3 years? (Rule 306(1)(a)(I))  GMC [] VI N/A
m) Are incompatible wastes stored in separate containers? (265.177(a))  GMC [] NI N/A
Hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b)) GMC
Incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))1 GMC [] NI N/A
31. If hazardous waste is being accumulated at the point of generation:
Container(s) < 55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))
E) Container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(\$)(1)), GMC [] NI N/A
Container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))
Arc the consainer(s) marked with the hazardous waste number? (Rule 306(2))
Rule 306(2) & 40 CFR 262.34(c)(1)(I) both refer to 40 CFR 265.171, 265.172 & 265.173(a).
e) Are container(s) in good condition? (265.171)
Are container(s) compatible with waste in them? (265.172)
Container(s) closed when not in use & managed to prevent leaks? (265.173(a))
32. If generator exceeded 55 gallons or 1 quart, w/in 3 days did generator, w/respect to that amount of excess waste (Rule 306(2): 40 CFR 262.34(c)(2))
Mark the container with the date the excess amount began accumulating?  Mark the container with the date the excess amount began accumulating?
Move to an area with secondary containment?  GMC [] NI N/A
Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.
33. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include:
Impervious base free of cracks? (264.175(b)(1))  GMC [] NI N/A
Sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2)) GMC [] NI N/A
c) Hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))
Run-on prevented unless sufficient capacity? (264.175(b)(4))  GMC [] NI N/A
e) Accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)5))  GMC [] NI N/A
If accumulating solids (other than F020, F021, F022, F023, F026, F027), is hazardous waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)) GMC [] NI N/A
Closure of accumulation area(s) is under question 50.
Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? Explain any yes answer.  NI N/A
Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))  GMC [] NI N/A
Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil  directly or indirectly, into surface, groundwaters, drains or sewers, and such that fugitive emissions do not violate Acti  451, Part 55? (Rule 306(1)(f))  co. saidobserved  OBSERVED
:Bas. Is hazardous waste accumulated in tanks? If so, complete Tank System inspection form.  NI N/A
Is hazardous waste placed on drip pads? If so, complete Wood Preserving inspection form.  NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16  PERSONNEL TRAINING (265.16)			
	7)		
A T L COLO COCE COLONIA	GPT	LI ON	I N/A
	GPT		I N/A
AN COLUMN AND A CO	GPT		I N/A
	GPT GPT	. /	I N/A
2 Marie V	GPT		I N/A
D. D. L. C. L. L. O. Oct. Level	GPT		I N/A
New Employee Orientatio		1	I N/A
	GPT		I N/A
	GPT	/	I N/A
Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.	Gr ₁	LUF IN	I IVA
PREPAREDNESS AND PREVENTION (265.30-265.37)		-	e ^t
41. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	GPT	co. said obse	erved II N/A
42. If required, does this facility have the following equipment:			
a) Internal communications or alarm systems? (265.32(a))	GPT	MN	II N/A
b) Telephone or 2-way radios at the scene of operations? (265.32(b))	GPT	[4 N	II N/A
c) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	GPT	LU N	II N/A
d) Adequate volume of water and/or foam available for fire control? (265.32(d))	GPT	W/N	N/A
43. Testing and Maintenance of Emergency Equipment:			
a) Owner/operator test & maintain emergency equipment to assure operation? (265.33)	GPT		II N/A
NOTE: Access to communication or alarm system is applicable only if required 40 CFR 265.32			ŭ.
b) Has owner/operator provided immediate access to internal alarms? (265.34(a&b))			
I) When hazardous waste is being poured, mixed, etc.	GPT		NI N/A
ii) One employee on the premises while facility is operating.	GPT	/	NI N/A
Aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	GPT		Ń N/A
Has the facility made arrangements with local authorities? (265.37(a)&(b))	GPT		N/A
Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.			
CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-26	5 56)	Godal	edenery.
	- 2/		9/1ar
45. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	GPT	1 [1]	NI N/A
46. Does the contingency plan contain the following information:		1 ,	fi fi
a) Actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a&b))	GPT	1 1	NI N/A
b) Describe arrangements or attempts w/ local police, fire, hospitals, contractors, state & local emergency responder emergency services; (265.52(c)) & (265.37(a)&(b))?	s for GPT	U V1	NI N/A
c) Name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	GPT		NI N/A

Comments:

Generator Inspection Form			
Solicitator mopestion room			
			YES NO NI N/A
d) List emergency equipment at the facility, including location, physical description & capabil	ities? (265.52(e))	GPT	NI N/A
e) Evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes	. (265.52(f))	GPT	[Y NI N/A
47. Emergency Coordinator and Emergency Procedures:			d
a) Coordinator familiar with site operation & emergency procedures? (265.55)		GPT	[ NI N/A
b) Emergency coordinator have authority to carry out the contingency plan? (265.55)		GPT	NI N/A
c) If emergency occurred, did coordinator followed emergency procedures? (265.56)	*	GPT	[] NI (N/A
<ul> <li>d) Fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten hur or generator has knowledge spill reached surface or ground water, did generator notify MI</li> </ul>	nan health or environn DEO? (Rule 306(1)(d))	nent GPT	[] NI N/A
48. Contingency plan Amendments and Copies:	(,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	353030	
a) Amended: fails in emergency; changes in regulations/emergency coordinators/emergency e	quipment? (265.54)	GPT	NI N/A
b) Copies of plan on site and sent to local emergency organizations? (265.53)		GPT	[] × NI N/A
Rule 309 refers to 262, Subpart E except 262.54 & 262.55		Secretary .	
INTERNATIONAL SHIPMENTS (Rule 309 & 310: 4	0 CFR 262.50-262	.60)	
Has the facility imported or exported hazardous waste?		GOR	NI (N/A)
an) Exporting, has the generator:	$\cap$	GOR	NI N/A
Notified the Administrator in writing? (262.52(a))		GOR	[] NI N/A
ii) Receiving country consented to accept waste. (262.52(b))			
		GOR	[] NI N/A
iii) Has copy of EPA Acknowledgment of Consent. (262.52(c))		GOR	[] NI N/A [] NI N/A
iii) Has copy of EPA Acknowledgment of Consent. (262.52(c))  iv) Compiled with manifest requirements Rule in 309(2)(a-i).			22 Section Contracts
		GOR	[] NI N/A
iv) Compiled with manifest requirements Rule in 309(2)(a-i).		GOR GOR	[] NI N/A
iv) Compiled with manifest requirements Rule in 309(2)(a-i).  v) If required, was an exception report filled. (309(3)(a-c))		GOR GOR	[] NI N/A [] NI N/A [] NI N/A
iv) Compiled with manifest requirements Rule in 309(2)(a-i).  v) If required, was an exception report filled. (309(3)(a-c))  b) Importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	ұ1 & 265.114)	GOR GOR	[] NI N/A [] NI N/A [] NI N/A
iv) Compiled with manifest requirements Rule in 309(2)(a-i).  v) If required, was an exception report filled. (309(3)(a-c))  b) Importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)  Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114.	11 & 265.114)	GOR GOR	[] NI N/A [] NI N/A [] NI N/A
iv) Compiled with manifest requirements Rule in 309(2)(a-i).  v) If required, was an exception report filled. (309(3)(a-c))  b) Importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)  Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114.  ACCUMULATION AREA CLOSURE (265.1)	11 & 265.114)	GOR GOR	[] NI N/A [] NI N/A [] NI N/A

c) All contaminated equipment, structures, and soil properly disposed of.

GMC

NI N/A





NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
'ARLENE J. FLUHARTY
'ORDON E. GUYER
KERRY KAMMER
ELLWOOD A. MATTSON
O. STEWART MYERS

BAYMOND POUPORE

## John Engler, Governor DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

S.E. MICHIGAN DISTRICT HEADQUARTERS
Waste Management Division
38980 Seven Mile Road
Livonia, MI 48152

March 7, 1991

Mr. George J. Beyer Technical Manager, Analytical and Support Henkel Corporation - Parker+Amchem 32100 Stephenson Highway Madison Heights, Michigan 48071

RE: MID 057676124

Dear Mr. Beyer,

On February 20, 1991 an inspection was conducted at your facility located at 32100 Stephenson Highway, Madison Heights, Michigan. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 P.A. 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

As a result of that inspection, it has been determined that your facility is in violation of the following requirements:

- 1. You have not inspected the storage facility since November of 1990 contrary to requirement of weekly and daily inspection as required under 40 CFR 265.15(a).
- Two employees Shawn Dolan and Jim Wenzel have not been trained as required under 40 CFR 265.16(b) and 265.16(c). Please go through your record and have those people in your facility that come in contact with hazardous waste trained and document such training. Make sure such trainings are made available to the coordinators.
- 3. According to Mr. Jack Garavanta, the emergency coordinator has changed and your emergency contingency plan has not reflected that change as required 40 CFR 265.54.



Mr. George J. Beyer Henkel Corporation - Parker+Amchem Page 2 of 2, 3-4-91.

- 4. One drum of waste paint sludge and mineral spirit dating from December 1990 was neither labelled not marked clearly with the words "Hazardous Waste" as required under R. 299.9614(1)(b) and the same container has not been inspected since November 1990 as required under 265.174.
- 5. The satellite accumulation in your paint room was missing the following:
  - (i) The drums were not marked with the hazardous waste number. (Rule 302(2)).
  - (ii) The drums were not stored open while not in use. (265.173(a)).
  - (iii) You exceeded the 55-gallon-limit and did mark the drums with date the excess amount started accumulating. This drum should be moved to your storage area. (262.34(c)(2))

We request your response by April 2, 1991 documenting your corrective actions to these violations.

If you have any questions, please contact me at (313) 953-0241.

sinderely,

1 Com Mbamah

Donald Mbamah

Environmental Quality Analyst.

DM/dm Enclosure

cc: B. Okwumabua

U.S. EPA, Region V

#### RCRA/ACT 64 INSPECTION REPORT

I.D. Number (U.S. EP	A or Michigan) M [ D 0 5	7676124
FACILITY NAME	32100 STEPHENSON	HEM HENKEL CORP-
	madison theights	Michigan 4807/ Zip Code
DATE 2 20 91		0.00 AM (to) 1.30 pm
person(s) interviewe George Beyer	Technique Mgr	TELEPHONE #
Jack Garavant	q	
INSPECTOR(S) -Donald Mbamal	AGENCY MDNR	TELEPHONE # 313 953024
Primary Business of	this Facility: Research	& Development of
Reason for Inspectio	L'under clasure	Not get closed)
Routine	Follow-up	Complaint

PR5122

(rev. 01-31-90)

#### RCRA/Act 64 Inspection Report

asec ipo	n the inspection, this facility:						FORM
is	a non-generator						
cc	nditionally exempt small quantity generator						
sn	all quantity generator inspection form		_		-		-A
ge	nerator inspection form tank(s) system inspection form	•••	~	_	_	_	B -B1
tr	ansporter inspection form	·					С
ERMITTED	TSDF						
tr	eatment/storage/disposal facility (Subpart A-E & generator appendix inspection form	I)	-		-	-	-D D1
	tank system storage inspection form (Subpart J) surface impoundments inspection form (Subpart K) waste piles inspection form (Subpart L)	_	_	_	<b>-</b>		-D2 D3 -D4
***	land treatment inspection form (Subpart M) landfill inspection form (Subpart N)	_	_	_	_	_	D5 -D6
<u> </u>	incineration inspection form (Subpart O) miscellaneous units inspection form (Subpart X)	~	-	-			D7 -D8
tr	TATUS TSDF eatment/storage/disposal facility (Subpart A-E &	I )	_		em.	_	-D9
	<pre>generator appendix inspection form groundwater monitoring (Subpart F) use w/ Subparts tank system storage inspection form (Subpart J)</pre>	-К,	, L , 1 -	1&N -	-	ata.	D1 D10 -D2
	surface impoundments inspection form (Subpart K) waste piles inspection form (Subpart L)	_	_	_			D11 -D12
	land treatment inspection form (Subpart M) landfills inspection form (Subpart N) incineration & thermal treatment inspection form	_ (S:	_ .ba:	_ -	_	 1	D13
	chemical, physical & biological treatment form (St						
OMMENTS:							
							**************************************
				<del></del>			
		- <del></del>					





#### Parker-Amchem

May 5, 1990

Ms. Cheryl Howe Senior Environmental Engineer Hazardous Waste Permits Section Waste Management Division Department of Natural Resources P.O. Box 30028 Lansing, Michigan 48909

Subject: Revised Closure Plan...

Hazardous Waste Container Storage Area

Reference: Henkel Corporation - Parker+Amchem

Madison Heights, Michigan

MID 057 676 124

Dear Ms. Howe:

Enclosed are four (4) copies of the above subject closure plan for the above referenced facility. The plan reflects the revisions outlined in your March 9, 1990 "notice of deficiency/letter of warning".

We appreciate your cooperation in this matter. If there are any questions, please do not hesitate to contact me at (313) 583-9300.

Very truly yours,

PARKER+AMCHEM

Jack Garavanta, Manager

Regulatory Affairs

Enclosures

bcc: G. Beyer

J. Richter

R. Walker

#### HENKEL CORPORATION - PARKER+AMCHEM MADISON HEIGHTS, MICHIGAN MID 057676124

## CLOSURE PLAN REVISED: MAY 10, 1990

#### SUBPART G CLOSURE AND POST CLOSURE

#### 265.110 APPLICABILITY

#### A. CLOSURE

This section applies to the storage of hazardous wastes in the drum storage area.

B. This section which applies to owners and operators of disposal facilities does not apply to the Parker+Amchem, Madison Heights facility.

#### 265.111 CLOSURE PERFORMANCE STANDARD

- A. Parker+Amchem will close the facility in a manner that:
  - 1. Minimizes the need for further maintenance, and
  - 2. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere.

#### 265.112 CLOSURE PLAN

The Part A application facility drawing showed two drum storage areas. This Closure Plan will address only "waste drum storage area no. 1." Attached to this Plan is a diagram showing the basic design of "waste drum storage area no. 1" and the soil sampling locations. Background soil samples will be taken from the facility's front lawn.

"Waste drum storage area no. 2" ceased use on February 11, 1987. The floor was inspected and found not to be cracked. The area was cleaned and the floor was sealed.

#### A. WRITTEN PLAN

- 1. Hazardous waste in the drum storage area will be removed to a proper disposal site within ninety (90) days after receiving the final volume of hazardous wastes. After waste removal and clean closure certification, this facility will operate as a "generator" of hazardous wastes subject to the administrative rules of Michigan Act 64.
- 2. a. The maximum inventory of drums in storage is 195 drums.
  - b. Type of drum waste stored:

```
D001...Ignitable Paint solvents
Ammonium Persulfate
D002...Corrosive Acids, Alkalies
D003...Reactive Arsenic, Mercury, Cyanide
D006...EP Toxic Cadmium
D007...EP Toxic Chromium
D008...EP Toxic Lead
D009...EP Toxic Mercury
```

- c. Drums are stored in an enclosed building with a concrete floor and curbing with no outlets.
- 3. a. Drums will be removed to disposal as per closure schedule. The wastes stored within the drum storage area are:

```
D001 ignitable
D002 corrosive

D006----| cadmium
D007 |--- EP Toxic... chromium
D008 | lead
D009----| mercury
001D
003D
```

b. Soil samples will be analyzed by an outside accredited laboratory for the following parameters:

```
Ph
Cyanide
Total Metals ---- | Arsenic
| Cadmium
| Chromium
| Lead
| Lead
```

4. After removal and off site disposal of all hazardous waste inventory, the drum storage area (including containment curbs) will be decontaminated with a detergent wash and double rinse. All waste waters and residues generated during the wash/rinse cycles will be contained within the containment area, collected, and pumped into drums. The estimated volume of decontamination wash/rinse liquid is anticipated to be less than 100 gallons per cycle.

Drums of wash/rinse water will be moved to the on site waste water treatment system. This system now treats the facility's waste water. The effluent meets all applicable parameters for pre-treatment prior to being discharged to the City of Detroit sewer system.

- 5. Work will be supervised by Parker+Amchem and performed by an outside contractor. Personnel will be equipped with appropriate protective clothing to ensure the workers' health and safety during the operation. Chemical neutralizers and spill control equipment will be available and will be employed in the event of a spill resulting from the cleaning operations.
- 6. Hazardous waste sampling methods, soil sampling methods, parameters, and test methods will be conducted in accordance with procedures outlined in "Test Methods for Evaluating Solid Waste", Section 1.2, USEPA Manual SW-846 (see attachment).

#### B. SCHEDULE FOR CLOSURE

1.	Thirty days after MDNR approval of the closure plan.	Day	7 0
2.	Disposal of final inventory of drummed waste.	90	days
З.	Core sampling and analysis.	100	days
4.	Decontamination of storage area.	120	days
5.	Restoration of the storage area for generator accumulation.	150	days
6.	Completion of the closure and Certification submitted to MDNR.	180	days

#### 265.114 DISPOSAL OR DECONTAMINATION OF EQUIPMENT

The limited hazardous waste drum storage area obviates the use of heavy equipment for closure activities. Decontamination of equipment will be restricted to a single transfer pump, and steam and water rinse hoses.

The transfer pump decontamination will consist of a steam cleaning and a water rinse of the exterior of the pump and its associated hoses. Equipment contamination wastes will be confined within the drum storage area. These waters will be pumped into a 55 gallon drum and disposed of at the on site waste water treatment system.

#### 265.115 CERTIFICATION OF CLOSURE

Upon completion of closure activities, the owner will submit to the MDNR a certification of closure signed by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. The certification will include supporting documentation as follows:

- A. A certification statement signed by both the owner and the independent registered professional engineer that the closure plan has been completed according to its terms or as per any subsequent amendments.
- B. A summary of decontamination procedures and how waste waters and miscellaneous solid materials (e.g. rags.boots, etc.) were disposed.
- C. All core sampling analytical results and procedures with specific references, weather conditions, run-off controls, and decontamination procedures.
- D. Results of all tests including charts, tables, lab sheets, and observation notes.
- E. A copy of the approved closure plan and the agency letter of closure plan approval.
- F. A copy of all manifests for hazardous wastes sent offsite for treatment and/or disposal.
- G. A QA/QC report on analytical activities.

#### 265.142 COST ESTIMATE FOR FACILITY CLOSURE

#### A. DRUM STORAGE AREA

1.	Drum dispo	osalb	ased on	a maximum
	of (195)	drums of	waste,	including
	transport	ation		

\$28,000.00

2. Site cleanup...includes labor and materials...

\$ 2,500.00

3. Soil testing...

\$ 3,000.00

#### B. CERTIFICATION

Estimated certification cost by an independent, registered professional engineer...

\$ 4,000.00

#### C. TOTAL COSTS...FACILITY CLOSURE

Total Cost...

\$37,500.00

#### MISCELLANEOUS

As listed in the "Notice of Deficiency", dated March 9, 1990; MDNR requested two additional items be entered into the closure plan.

The name of the facility contact person for closure 1. activities is:

George J. Beyer

Analytical Support Manager

Alternate: Jack Garavanta

Regulatory Affairs Manager

Facility address: 32100 Stephenson Highway

Madison Heights, Michigan 48071

(313) 583-9300 Telephone Number:

- Henkel Corporation Parker+Amchem will notify the MDNR 2. Waste Management Division, Hazardous Waste Permits Section (517) 373-9881 and the MDNR Northville District (313) 344-4670 at least five work days in advance of the following activities:
  - a. Storage pad decontamination
  - b. Soil sampling
  - c. Soil excavation and resampling (if necessary)
  - d. Restoration of the storage pad for generator accumulation.

Attachments

#### I. METHODS USED TO SAMPLE DRUMMED HAZARDOUS WASTE INVENTORY

HAZARDOUS	WASTES:	D001	Ignitable	
		D002	Corrosive	
		D006	EP Toxic	cadmium
		D007	EP Toxic	chromium
		D008	EP Toxic	lead
		D009	EP Toxic	mercury

For the above listed hazardous wastes:

SAMPLING METHOD: Sampling a drum from "samplers and sampling

procedures for hazardous waste streams", EPA

600/2-80-018, page 36.

<u>DESCRIPTION</u> Composite sample from multiple containers, <u>OF SAMPLING</u>: reference section "D" random samples, EPA

600/2-80-018, January, 1980, page 67.

REFERENCE Test method for the evaluation of solid

FOR SAMPLE: waste, physical/chemical methods (SW-846).

[NOTE: No listed wastes are in the inventory.]

#### II. PARAMETERS AND TEST METHODS FOR DRUMMED WASTE

<u>PARAMETER</u> <u>TEST</u>

pH Method 5.2

Flash Point Peneky-Martena

Closed Cup Tester

Method 4.0

Corrosivity Method 5.2

EP Toxicity EP Toxicity Appendix II

264.24

REFERENCE: USEPA Manual SW-846..."Test Method

for Evaluation of Solid Waste,

Physical/Chemical Methods"

## Contingency Plan and Emergency Procedures and SPCC Plan

#### | Purpose:

In the event of an emergency at the Madison Heights facility due to fire, explosion or any unplanned release of hazardous waste to air, soil or surface water, a definite plan is necessary to minimize hazards to human health or the environment.

The provisions of this plan must be carried out immediately whenever there is an emergency due to fire, explosion, or release of hazardous waste.

2. F Responsibility Plan Inglementation

The order of responsibility for implementing this plan is as follows:

1. Roger Walker, Vice President, Operations

Office: (313) 583-9300 (X-4613)

Residence: (313) 540-9480

2. Jack Garavanta, Regulatory Affairs Manager

Office: (313) 583-9300 (X-4830)
Residence: (313) 641-7367

Residence: (313) 641-7367

3. Dave Grandy, Director, Human Resources

Office: (313) 583-9300 (X-4603) Residence: (313) 375-9541

4. George Beyer, Technical Manager (SPCC Plan Coordinator)

Office: (313) 583-9300 (X-2364)

Residence: (313) 689-8363

5. Don Cole, Maintenance Foreman (SPCC Alternate Coordinator)

Office: (313) 583-9300 (X-2303)

Residence: (313) 629-9838

Home address must be included per 265.52(d)

HAZARDOUS WASTE RESTRICTED FROM LAND DISPOSAL NOTICE TO PETRO-CHEP PROCESSING, INC.

On manifest number ///	12199789 line	item //a	(A.B.C.O.E.D.)
the waste bearing the	EPA hazardous wast	e number(s)	

is subject to the land disposal restrictions of 40 CFR Part 268. In accordance with 40 CFR 268.7, this generator is providing notice that the waste does not meet the treatment standards specified in Part 268 Subpart D or does not meet the prohibitions specified in 268.32 or RCRA section 3004(d). The treatment standards follow:

		Nonwasi	ewater	
Hazardous waste description	Constituents of concern	Total com- position, mg/kg	TCLP, mg/L	Wastewater, total composition, mg/L
P001 - Spent halogenated	Carbon tetrachlonde		0.96	0.05
sorvents used in degreasing	Methylene chloride		0.96	0. <del>20</del>
•	Tetrachioroethylene		0.05	0.079
. <b>&amp;</b>	1.1.1-Trichloroethane		0.41	1.05
	Trichioroethyleae		0.091	0.062
	1,1.2-Trichloro-1,2.2-tri- fluoroethase		0.96	1.05
	Trichlorofluoromethane		0.96	0.05
P002 - Spent halogenated	Chlorobenzene		0.05	0.15
solvents	1.2-Dichlorobenzene		0.125	0.65
	Methylene chlonde		0.96	0.20
	Methylene chloride (from the pharmaceutical industry)			0.44
	Tetrachioroethylene		0.05	0.079
	1.1.1-Trichioroethane		0.41	1.05
•	1.1.2-Trichloroethane	7.6		0.030
F	Trichloroethylene		0.091	0.062
	1,1,2-Trichloro-1,2,2-tn- fluoroethane		0.96	1.05
<i> ✓</i>	Trichloroflyoromethane		0.96	0.05
P003 - Spent non-halogenated	Acetone		0.59	0.05
/ solvents	n-Butyl aicobol		5.0	5.0
7	Cyclobexagone		0.75	0.125
	Ethyl acetate		0.75	0.05
	Ethyl benzene		0.053	0.05
	Ethyl ether		0.75	0.05
	Methanoi		0.75	0.25
	Methyl isoburyl ketone		0.33	0.05
	-Xylese		0.15	0.05
F004 - Spent non-halogenated	Cresois (and cresylic acid)		0.75	2.82
<b>∠</b> solvenus	Nitrobessesse		0.125	0.46
P005 - Spent non-halogenated	Benzene	3.7		0.070
/ solvenus	Carbon disulfide		4.81	1.05
	2-Ethoxyethanoi	Incineration	•	Biological degradation or microscration
	Isobutanoi		5.0	5.0
	Methyl ethyl ketone		0.75	0.0\$
	2-Мигоргораве	Incineration		(Wet acidation or chemi- cal acidation) followed
				by carbon adsorption; or incineration
•	Pyridine		0.33	1.12
	_Foluene		0.33	1.12

Check the appropriate box(es), and, circle each chemical entity likely to be present in each waste number.

Circle each of the following characteristic wastes also likely to be present in the waste.

Waste Code   Description	
Low TOC Ignitable Liquids (<10 wt% TOC) NA   268.42tal DEACT   268.42tal PORGS, FSUBS, or INCIN   D002   Corrosives, all subcategories & CA list   268.42tal DEACT   268.42tal DEACT   268.42tal DEACT   D004   Arsenic (As)   268.43tal	
High TOC Ignitable Liquids (>10 wt% TOC) NA 268.42(a) RORGS, FSLBS, or PICIN	
D002 Corrosives, all subcategories & CA list 268.42(a) DEACT 268.42(a) DEACT 268.42(a) DEACT 268.43(a) 268.43(a) Variance until 5-1 D005 Barium (Bal 268.43(a) 268.43(	WDV72
D004 Arsenic (As) 258.43(a) 268.41(a) Variance until 5-1	
D005 Barium (Bal 268.43(a) 268.41(a)	j-8-
D006 Cadmium (Cd) 268.43(a) 268.41(a)	
DO07 Cromum (Cr) 268.43(a) 268.41(a)	
DOOS Lead (Pts) 268.43(a) 268.41(a)	
DOOS: Low Mercury Subcategory (<260 ppm Hg) 268.43(a) 268.41(a) Variance until 5-	}-8-
High Mercury Subcategory (>= 260 ppm Hg) 268.43(a) 268.42(a) RMERC Variance until 5-	j-8-·
DO 10 Selenium (Se) 268.43(a) 268.41(a)	
0011 Silver (Ag) 268.43(a) 268.41(a)	
Other Codes See attachment for supplemental list	

(Check if applicable) This waste is principally an organic liquid, and therefore, it is my best judgement that this material presents substantially the same environmental risk as F001-F005 spent solvents, and this, should be restricted from land disposal.

Generator Firm Name:	PITEKER + AMEHEM
Generator Signature:	George & Sign
Name & Title of Generator	technical Marager
Wome a reserve	
BPA ID No.: 11/10057	676124 Date: 2-5-91

RJP080190WTI LDR33

#### SUBPART B

265.15 General Inspection Requirements- All areas at the Parker, Madison Heights facility where hazardous waste is stored, will be inspected weekly. The inspector will look for malfunctions, deteriorations, operator errors, unusual discharges, corrosion to storage drums, leaking drums, bulging drums, compatibility of wastes, adequate aisle space and any other function considered detrimental to a safe oppration. An inspection schedule and log will be maintained indicating problems found and remedial action taken. Any spills or deteriorated drums must be corrected immediately and logged.

DATE 1990 TIME	INSPECTOR	PROBLEM	REMEDIAL ACTION
6-4 AM	Aff		
10-9 AM	818		
10-19 PM	HIB.		
10-29 AM	816	Show corresponding	all Waste Kenwood,
11-1 AM	JB.	drages- Core sample of	no strage until
11-6 AM	21/3		Okourd Completed
11-15 PM	SYS		
11-27 PM	Allo		
		44.	
	M		
			- Landau Control of the Control of t

## RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information	D: 1 - 0-	الممال	North	al lan	Ø
Facility:	Parker Ar	n mem	Hewa		V
U.S. EPA ID No.:	MID 057				
Street:	32100 C Madison H	<u>temphen</u>	Jon +	ligh wa	7
City:	Madison H	State	: M   Zip:_	48071	
Telephone:	33	www	· EANS · · · · · · · · · · · · · · · · · · ·		
Inspection Date:	2_/2091 Time	: 10,07 (qu	pm)		
Weather Conditions:		****			
Inspectors:	Name  O. m. g. Am A	Agency/Title  H Mb M		ohone 3 957	124)
Facility Representatives:  See Appendix B to determi	Morge B		egories the faci	lity manages:	
Ger Ger	nerate Transport	Treat	Store	<u>Dispose</u>	•
F001-F005 Solvents	た。——	•	<del>-</del>	<u>.                                    </u>	
F020-F023 and F026-F028					
California List *	· · · · · · · · · · · · · · · · · · ·	<u></u>	-		
First Third [40 CFR 268.10]			· · · ·		
Second Third	<u> </u>		-		
Third Third					

* See Appendix A

#### INSPECTION SUMMARY

Processes That Generate LDR Wastes:

		,		
·				•
	**			
		•		
,				
•				
				•
LDR Waste Management:				
			•	
			,	
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				<u>:</u>
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C				
Summary:				
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Ci				
Signature:	ή.			
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2

#### RCRA LAND DISPOSAL RESTRICTION INSPECTION

## III. GENERATOR REQUIREMENTS

<b>4.</b>	Treatability Group/Treatment Standard Identification*								
	*Note: and othe	Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.							
	1.	F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?							
		Yes_	No_	NA		·			
		If avail	able, list each	waste code and check	the prrect treatability gro	oup.			
	۵	Waste	<u>Code</u>	Wastewater*	<u>Nonwastewater</u>				
	1	) ^v <del>2) 1(</del>	<del>}-</del>	AAAGO-MARKADANAET	**************************************				
				<del></del>	AGRICANING ZELEGICIPATOR INVESTOR .				
		*Less ti F005 so	han 1% by weigh lvent constitue	t total organic carbon nts listed in 40 CFR 26	(TOC), or less than 1% by wei 8.41, Table CCWE. [40 CFR 26	ght total F001- 8.2(f)(1)]			
		Comm	ents						
	. 2.	F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?							
		Yes _	_ No _	NA 🗸					
		If yes, list each waste code and check the correct treatability group.							
		Waste	Code	Wastewater*	Nonwastewater				
			<del></del>						
		Сотп	nents						
		*Less 1 [40 CF	than 1% TOC by 1 R 268.2(f)]	weight and less than 1%	total suspended solids (TSS)	by weight.			
	3.	First,	Second, and T	hird Third Wastes:					
		a.		Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?					
			Yes	No N	A				

-	Waste Code	Subcategory	Wastewater*	<u>Nonwastewater</u>
	* Less than 1%	TOC by weight an	d less than 1% to	tal suspended solids
	(TSS) with the 5% by weight TO than 4% by weigh	following except XC and less than ght TOC and less	ions: K011, K013, 1% by weight TSS; than 1% by weight	tal suspended solids and K014 wastewaters - less than K103 and K104 wastewaters - less TSS. [40 CFR 268.2(f)(2) and (3)]
	Comments	-	······································	
				d wastes cover constituents that stics? [40 CFR 268.9 (b)]
	Yes 🗸	No	NA	
	Does the gen	erator specify a	lternative treatm	nent standards for lab packs?*
	Yes	No	$NA \sqrt{}$	
	*Use of the al	ternative treatm	ent standards is m	not required. [55 FR 22629]
	If yes, do lab	packs only cont	ain the following	g wastes?* [40 CFR 268.42(c)(2
			irt 268, Appendi 268, Appendix V	x IV constituents 7 constituents
	*Unregulated a commingled in	eastes and hazard the appropriate	ous wastes which m Appendix IV and V	neet treatment standards may be lab pack. [55 FR 22629]
	source leach	ate?*	/	nent standards for F039 multi-
	Yes	No	NA /	
				required. [55 FR 22619]
for tre	rnia List Wast eatment stand	es: Has the gen ard/prohibition	erator correctly i level for the foll	identified the treatability group owing wastes? [55 FR 22675]
	Liquid hazar	dous wastes co	ntaining PCBs <u>&gt;</u>	50 ppm
	Yes	No	NA	
	If yes, check	the appropriat	e treatability gro	up:
	50 to 5	00 ppm PCBs		•
	- 500	opm PCBs		

4.

	b.				; ≥1,000 mg/l (liqu or characterized b	
		Yes	No	NA		• .
		If yes, che	ck the appropri	ate treatability	group:	
		All ot	e HOC wastewa ther HOCs grea (liquids) or mg/k	ter than or equa	to 10,000 mg/l HC al to the prohibitio	PCs) on level of 1,000
	C.	Liquid ha ≥ 134 mg	zardous wastes /l nickel and/or	that exhibit a ch ≥130 mg/l thall	naracteristic and al lium	so contain
		Yes	No	NA		
5.	Natio been A.)	nal Capacit identified fo	y Variance Was or wastes covere	tes: Have all ap	plicable California al capacity varianc	List prohibitions es? (See Appendix
	Yజs_		No	NA		•
	the w	aste codes,	contains a mixtohas the generate rohibitions? (Se	or identified all	applicable treatme	applies to some of ent standards and
	Yes .		No	NA		•
	comp	olete the fol	t prohibitions ar lowing table for variances expi	each waste cod	eams managed by t le, noting the date	the generator, on which relevant
	Wast	e Code	Cal List	Applicability	Expiration Dat	<u>te</u>
	<del></del>			- Factoring Control	//	
		ments		5404AT., .	-	
6.	Trea an al	lternative m	ethod to that re	equired in 40 CF	inologies: Has the FR 268.42?	generator specified
	Yes	-	No	NA_(/		
	If ye metl	s, list the wa	aste code, the te cumentation of	echnology special approval. [40 C	iied in 40 CFR 268 CFR 268.42(b)]	3.42, the alternative
	<u>W</u>	aste Code	Required Tech	nology Alterna	tive Method	<u>Approval</u>
			24.00			
	Соп	nments				

	b.	Listed or (non-liquicontent)	characteristic w ids) HOCs, whi	rastes containing ch are not listed	g ≥1,000 mg/l (liq l or characterized	luids) or mg/kg by the HOC
		Yes	No	NA		•
		If yes, che	eck the appropr	riate treatability	group:	
		All o	ther HOCs gre	vater (1,000 mg/l ater than or equ kg (non-liquids)	to 10,000 mg/l H al to the prohibit	ion level of 1,000
	C. (	Liquid ha > 134 mg	zardous wastes g/l nickel and/o	s that exhibit a circle $\geq$ 130 mg/l thal	haracteristic and llium	also contain
		Yes	No	. NA		
5.	Natio been A.)	nal Capaci identified f	ry Variance Wa or wastes cover	ed under nation: //	oplicable Californ al capacity varian	nia List prohibitions nces? (See Appendix
	Yes_		No	NA		•
	the w	aste codes,	has the genera		l applicable treati	y applies to some of ment standards and
	Yes		No	NA		
	comp	olete the fo	t prohibitions a llowing table fo y variances exp	or each waste cox	eams managed by de, noting the dat	y the generator, te on which relevant
	Wast	te Code	Cal List	t Applicability	Expiration D	<u>ate</u> 
	Com	ments				·
6.	Тгеа	tment stan	nethod to that r	required in 40 C	hnologies: Has th FR 268.42?	ne generator specified
	Yes	al-articles	No	NA_(/		
	If ye metl	s, list the w hod, and do	aste code, the tocumentation o	technology speci f approval. [40 (	fied in 40 CFR 20 CFR 268.42(b)]	68.42, the alternative
	<u>W</u>	aste Code	Required Tech	nnology Alterna	ative Method	<u>Approval</u>
		********				
	C	nments	<u></u>	·:	<del></del>	<u> </u>
	ı 🗥	HITE DIN				

	7.	Does the generator mix restricted wastes with different treatment standards for a constituent of concern?
		Yes No
	r	If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]
		Yes No
		Comments
3.	Wast	e Analysis
	1.	Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]
		Yes
-	·	*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.
		If no, does the generator ship all restricted wastes as not meeting treatment standards?
		Yes No
-	,	Comments
	2.	Which of the following analytical methods does the generator employ?*
		*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.
		a. Knowledge of waste:
		Yes No
		If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]
	•	b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)
		Yes No NA
		<pre>"TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I,     EPA Test Method 1311) ""See Appendix C for exceptions. ""***********************************</pre>

	test, the frequency of testing, and note any problems. Attach test results.  [40 CFR 268.7(a)(5)]
c.	Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)
	Yes No NA
	*See Appendix C for exceptions.
	If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]
d.	PFLT*: Was PFLT used to determine if California List constituents were contained in <i>liquid</i> hazardous waste?
	Yes No NA
	*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]
	If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]
	the generator treat restricted wastes in 90-day tanks or containers regulated 40 CFR 262.34 (permissible in some states)?
Yes _	No _// (If No, go to 4.)
	the generator treat the wastes to meet appropriate treatment ards/prohibition levels?
Yes_	No V
If yes, testin	has the generator prepared a waste analysis plan detailing the frequency of g to be conducted? 40 CFR 268.7(a)(4)]
Yes_	No (If No. go to 4.)
Does	the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]
	ased on a detailed chemical and physical analysis of a representative sample contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

3.

Yes _	No
Comn	nents
Diluti	on Prohibition [40 CFR 268.3]:
a.	Does the generator mix prohibited* wastes with different treatment standards?
	*See Appendix E for distinction between restricted and prohibited wastes.
٠	Yes No (If No, go to b.)
	List the wastes
	Are the wastes amenable to the same type of treatment? [55 FR 22666]
	Yes No
	Comments
ъ.	Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]
	Yes No (If No, go to c.)
	Check appropriate category:
	Dilutes to meet treatment standards Dilutes to render waste non-hazardous
	Do the wastes fall into the following categories? (Check if appropriate.) [4 CFR 268.3(b)]
	<ul> <li>Managed in treatment systems regulated under the Clean Water Act</li> <li>Non-toxic* characteristic wastes</li> <li>Treatment standard specified in 40 CFR 268.41 or 268.43</li> </ul>
	*Won-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanida and sulfides). [55 FR 22666]
· 502	If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.
c.	Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute adequate treatment? [40 CFR 268.3(a)]
.*	Yes No
	Comments

	5.		ulti-source leachate: Has the generator run an initial analysis for all ents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]	
		Yes _	No NA	
c.	Mana	gement		
	1.	On-Sit	Management	
		a.	Are restricted wastes treated (other than in a RCRA exempt unit), stored fo greater than 90 (small quantity generator* - 180) days, or disposed on site?	Γ
			Yes No	
			(If yes, the TSD Checklist must also be completed.)	
			* Small quantity generator $\approx$ generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste	
			Comments 736	_
		ъ.	If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]	0
			Yes No NA	
		c.	If the generator treats characteristic wastes in RCRA exempt units to rende them non-hazardous, are the wastes managed as restricted until 40 CFR Par 268 treatment standards are met?* [40 CFR 268.9(d)]	
			Yes No NA	
			*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.	ł
	2.	Off-S	e Management: Waste Exceeds Treatment Standards	
		<b>a.</b>	Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?	<u>.</u>
			Yes No (If No, go to 3.)	
			Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.	
	•		Waste Code Receiving Facility	
			**************************************	

	100es the gen- [40 CFR 268.	•	e a notification to the treatment or storage facility?
	Yes	No	(If No, go to 3.)
			Iternative treatment standards for lab packs, is the CFR 268.7(a)(7) or (8) included with the
	Yes	No	NA
b.	Is a notificati	on sent with e	each waste shipment?
	Yes	No	
	If no, is the w		o a tolling agreement pursuant to 262.20(e) (small
	Yes	No	· (If No, go to 3.)
		des and subse ment is held.	quent handler with whom a contractual
	Waste Code	Subse	quent Handler
,			
•		the first waste	erator provide a notification to the receiving shipment subject to the tolling agreement? [40]
	Yes	No	
3. Off-	Site Manageme	nt: Waste Me	ets Treatment Standards
_, a.		nerator ship w off-site dispos	vaste that meets treatment standards/prohibition al facility?
	Yes	No	(If No, go to 4.)
	Identify was	te code(s) and	l off-site disposal facilities:
7	Waste Code	<u>1</u>	Receiving Facility
		-1000-0-0	*
			de a notification and a certification to the disposal
			)(2)(i) and 268.7(a)(2)(ii)]?
	Yes	No	(If No, go to d.)

υ.	Are a notification and a	definiteation sent with each waste simplifient.
	Yes No	
	If no, is the waste subjequantity generator only	ect to a tolling agreement pursuant to 262.20(e) (small y)?
	Yes No	(If No, go to c.)
	List waste codes and su tolling agreement is he	ibsequent handler with whom a contractual
	Waste Code	Subsequent Handler
•		generator provide a notification and a certification to ith the first waste shipment subject to the tolling 268.7(a)(9)]
	Yes No	<u>-</u>
c.	Are characteristic was RCRA exempt unit) s	tes which have been rendered non-hazardous (in a hipped to a Subtitle D facility?
	Yes No	NA (If No or NA, go to 4.)
	Complete the following	ng table:
	Waste Code	Receiving Facility
	Are a notification and Administrator or auth	d a certification for each shipment sent to the Regional norized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?
	Yes No _	<u> </u>
4.	Off-Site Managemen	t: Wastes Subject to Variances, Extensions, or Petitions
a.	which are subject to a	hip wastes to a treatment, storage, or disposal facility a national capacity variance (40 CFR Part 268, Subpart stension (40 CFR 268.5)?
	Yes No	(If No, go to 5.)
	Complete the follow	ing table:
	Waste Code	Receiving Facility
	<del></del>	
		The state of the s

	Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]						
	Yes	No					
ъ.	Is a notificati	on sent with	each waste shipn	nent?			
	Yes	No					
			to a tolling agree generator only)?	ment pursuant	to 40 CFR		
	Yes	No	(If No, go t	o 5.)			
,	List waste co tolling agree		sequent handler v	vith whom a co	ntractual		
	Waste Code	<u>Su</u>	bsequent Handle				
		the first was	enerator provide : te shipment subje				
	Yes	No					
Reco	rds Retention				•		
			e copies of all no of 5 years? [40 C		ifications, and other ]		
Yes	_ No						
certi		n site for at			notification and/or ermination of the		
Yes	No	<u> </u>	NA				
expi	LDR documented national casision*?	ts reflect pro pacity varian	per management aces, case by case	of wastes previ extensions and	iously covered under the soft hammer		
Yes	/ No		NA		· •		
waste	s which had tre	atment standar	oft hammer provisioned in variance to 08/08/9	the Third Third	05/08/90. Soft hammer rule were granted a		
Соп	nments				········		

5.

D.	Treati	nent Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes
	1.	Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?
	•	Yes \( \sum_ \) No (If No, do not complete this section.)
		List types of waste treatment units and processes:
		Waste Code Type of Treatment Treatment Units and Processes
	٠	waste vaste waste water freshment um t
	2.	Are treatment residuals generated from these units?
		Yes <u>/</u> No
		Comments
	3.	Are residuals further treated, stored for greater than 90/180 days, or disposed on site?
		Yes No NA
		(If yes, the TSD checklist must also be completed.)
		tional Comments, Concerns, or Issues Not Addressed in the Checklist:
E.	Addi	
	<del></del>	
	<u></u>	
		\ \
		•

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

### IV. TSD REQUIREMENTS

Waste	Analysis	[40 CFR 268.7(b), 2	64.13, and 265.	13]	•			
1.		e waste analysis plan 264.13(b)(6) and 26		owing LDR	waste categories?			
	F001-F0	05 Spent Solvents		Yes <b>∭</b>	No	NA		
	F020-F0	23 and F026-F028 D	oioxins	Yes	No	NA_		
	Californ	ia List Wastes		Yes	No	NA 🆺		
	First, Se	cond, and Third Thi	rd Wastes	Yes	No	NA		
	Comme	nts						
2.	Has the	waste analysis plan b	neen revised to	address F039	multi-source lea	chate?		
	Yes	No	NA 🏑			-		
3.	What da	ate was the waste and	alysis plan last r	evised?/				
4.		nalytical data contain ed/wastes? [40 CFR				or dispose of		
	Yes _	No		•				
	apply.):	which of the following	_		•	m N		
	Ge Fac Fac	nerator provides dat cility performs analys cility contracts analys	a es in on-site lab es at off-site lab	ooratory — k	clayton	and Counter		
	If the g	enerator provides da 64.13(a)(2) and 265.1	ita, does the fac			/ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		
	Yes	No	1 mag		WILL ME	-2007		
a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]								
		*See Appendix C for e **BDAT = best demonst	exceptions. trated available	technology. S	ee Appendix A.			

			test, frequency of testing, and note an CFR 264.73 (b)(3) and 265.73(b)(3)]	y problems. Attach test results. [40
		b.	Are wastes with treatment standards susing total constituent analysis?* (BI [40 CFR 268.7(b)(3)]	specified in 40 CFR 268.43 analyzed DAT = destruction/removal technology)
			Yes No NA	
			*See Appendix C for exceptions.	
•		•	If yes, list the wastes for which total countries the date of last test, frequency of test results. [40 CFR 264.73 (b)(3) and 26	onstituent analysis was used and provide ing, and note any problems. Attach test 55.73(b)(3)]
		c.	Is the paint filter liquids test (PFLT) wastes are contained in <i>liquid</i> hazard	used to determine if California List ous waste? [40 CFR 268.32(i)]
			Yes No NA _	_
				was used and provide the date of last e any problems. Attach test results. [40
В.	Ope	rating R	cord [40 CFR 264.73 and 265.73]	
	1.	speci	the operating record contain records as ied in 40 CFR 268.4 and/or 40 CFR 268.6 (b)(3)]	nd results of waste analyses performed as 3.7(b)? [40 CFR 264.73(b)(3) and
·	2.	Does [40 C	the operating record contain copies of FR 264.73(b)(11), (13), and (15) and 4	LDR notifications and certifications?* 0 CFR 265.73(b)(11), (13), and (15)]
		Yes	No de both those received from generators, an	d these propored for off-site shipments
	3.	Does which		te documentation for restricted wastes
		Yes	No NA	

	Yes	No	NA	
	*Note that the streatment stand	soft hammer provi ards established ty variance to 08	sion expired as of 05/08/90. S in the Third Third rule were gr /08/90.	oft hammer wastes which had anted a minimum 90-day
Storage	e [40 CFR 268.	50]	,	
1.	Are prohibited	d* wastes stored	on site in containers?	
	Yes	No	(If No, go to 2.)	
	*See Appendix E	for distinction	between restricted and prohibit	ed wastes.
******	Are all containstorage? [40]	ners clearly mar CFR 268.50(a)(2	ked to identify the contents a $2)(i)$	nd date(s) entering
	Yes 📈	No		
		been stored for ent into effect?	more than one year since the	applicable LDR
	Yes	No 🗸	(If No, go to 2.)	• .
	Can the facili recovery, trea	ity show that suc atment, or dispo	th accumulation is necessary t sal? [40 CFR 268.50 (c)]	o facilitate property
	Yes	No	14	
	If yes, state h	iow:	1	
2.	Are prohibite	ed wastes stored	on site in tanks?	A
	Yes	No 💆	(If No, go to 3.)	
	hazardous w	aste received, an recorded and m	with a description of the cont nd date each period of accum- aintained in the operating rec	ulation begins, or is such
	Yes	No		•
	Have tanks went into ef		least once per year since the	applicable LDR regulations
	Yes	No	(If Yes, go to 3.)	
				•

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

C.

		Can the facilit recovery, treat	y show that so tment, or disp	uch accumul xosal? [40 CI	ation is neccesary to facilit FR 268.50(c)]	ate proper
		Yes	No			
		If yes, state ho	)w:			****
	3.	Does the facil			waste containing PCBs at	concentrations
		Yes	No_	(If No, g	go to D.)	
		Does the facil	ity meet the	TSCA criteri	a in 40 CFR 761.65(b)? [4	40 CFR 268.50(f)]
		Yes	No 🌓			
		Have these w	astes been sto	ored for more	e than one year? [40 CFR	268.50(f)]
		Yes	No			
D.	Treat	ment	WA			÷
	1.	Does the facil	lity treat resti	ricted wastes	other than in surface impo	oundments?
•		Yes	No	(If No,	do not complete this section	on. Go to E.)
	2.	Are required specified in 4			t wastes which have treatm 268.40(b)]	nent standards
		Yes	No	NA	(If Yes or NA, go	to 3.)
		Was an altern	native method	i approved?		
		Yes	No	T.		
		List each was method. Che 268.42(b)]	te code, the teck if approve	echnology spall of the alter	pecified in 40 CFR 268.42, mative method is document	and the alternative ited. [40 CFR
		Waste Code	Required *	Technology	Alternative Method	<u>Approval</u>
						• • •
	3.	from lab pact	ks containing e with the sul	D004, D005	indards are specified, are in , D006, D007, D008, D010 ment standards for these o	), and D011 treated
		Yes	No	NA		

4.	Descr	ibe all other waste codes and treatment processes:
	Waste	Code Treatment Processes
•	1	
5.	Chara	cteristic wastes:
		40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 cteristic level?*
	Yes _	No
	*This and 26 charac	applies to both concentration based treatment standards specified in 40 CFR 268.41 8.43, and to some 40 CFR 268.42 required methods which result in treatment below the teristic level. See Appendix D.
	treatr	does the facility manage the waste as restricted until 40 CFR Part 268 nent standards are met, even after the waste is rendered non-hazardous? [40 268.9(d)]
	Yes_	No
	Comr	nents
6.	Dilut	ion Prohibition [40 CFR 268.3]:
	a.	Does the facility mix prohibited wastes with different treatment standards?
		Yes No (If No, go to c.)
		List the wastes
	ъ.	Are the wastes amenable to the same type of treatment? [55 FR 22666]
		Yes No
		If yes, is this method used for the aggregated wastes?
		Yes No
		Comments
	c.	Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]
		Yes No
		Comments

7.	Does the facilit from all treatm	y, in accordance with an acceptable waste analysis plan, test residues ent processes? [40 CFR 268.7(b)]
	Yes	No
	Comments	
8.	Does the facilit	ry ship any characteristic wastes which have been rendered non- Subtitle D facility?
	Yes	No (If No, go to 9.)
	Complete the	following table:
	Waste Code	Receiving Facility
	<u></u>	
	Are a notificat Administrator	ion and a certification for each shipment sent to the Regional or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]
	Yes	No
9.	Does the facili facility?	ty ship any wastes or treatment residues to an off-site land disposal
	Yes	No (If No, go to 10.)
	Complete the	following table:
	Waste Code	Receiving Facility
	Are a notification waste shipmer	tion and a certification provided to the land disposal facility with each at? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]
	Yes	No
10.	Does the facil different treat	ity ship any wastes or treatment residues to be further managed at a ment or storage facility?
	Yes	No (If No, go to E.)

		Complete the following table:
		Waste Code Receiving Facility
		Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]
÷		Yes No
E.	Surfa	ace Impoundments [40 CFR 268.4]
	1.	Are restricted wastes placed in surface impoundments for treatment?
		Yes No (If No, go to F.)
	-	List
	2.	Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]
		Yes No
	·	Comments
	3.	Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]
		Yes No
	4.	If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]
		Yes No NA
	5.	Are representative samples of sludge and supernatant from the surface impoundment ested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR $268.4(a)(2)(i)$ ]
		Yes No
	6.	Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]
		Yes No
		Comments

	7.	Do the treatment standards/pro			iids) exceed applicable treatment
		Sludge	Yes	No	Waste Code
		Supernatant	Yes	No	Waste Code
		Provide the fr	equency of a	nalyses conduct	ted on treatment residues:
	8.			reatment standa 268.4(a)(2)(ii)]	ards/prohibition levels, are they removed on
		Yes	No	NA	
		Comments _			
		Are residues : 268.4(a)(2)(ii		managed in an	other surface impoundment? [40 CFR
		Yes	No		
	9.				eatment standards, is annual throughput CFR 268.4(a)(2)(ii)]
		Yes	No	NA	•
ė		Comments			
F.	Land	Disposal	NA		
	1.	impoundmen	its*, waste pil	ed in or on the les, land treatme s? [40 CFR 26	land in units such as landfills, surface ent units, salt domes/beds, mines/caves, 8.2(c)]
		Yes	No	(If No, go	to G.)
		*Note: Do not	include surfa	ce impoundments	addressed in E.
		If yes, specify	which units	and what waste	s each unit has received:
		<u>Unit</u>		$\underline{\mathbf{w}}$	aste .
		-			
	2.	wastes prior	to land dispos	sal to ensure th	cceptable waste analysis plan, test prohibited at all applicable treatment standards and/or FR 268.7(c)(2)]
	-	Yes	No		
		Comments_		***	

3.	Does the factoring the point of	cility test wastes disposal?* [40	to ensure that they do not exhibit any characteristics at CFR 268.9(c)]
	Yes	No	NA
	*Note: A ⊌a that	ste may exceed a characteristic h	characteristic level only if the treatment standard for has been met.
4.	Does the opperformed 265.73(b)(3	in accordance w	adequately document the results of waste analyses with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and
	Yes	No	
	If yes, at wh	nat frequency ar	e analyses performed?
5.	Does the fa	acility land dispo	ose of restricted wastes which are not prohibited?
	Yes	No	(If No, go to 6.)
	List waste	codes in approp	oriate category below:
	Case-By-C	ase Extension (	ce (40 CFR Part 268, Subpart C)
	copy of the restricted	e generator noti	d contain records of the quantities, date of placement, and a diffication [40 CFR 268.7(a)(3)] for each shipment of a case-by case extension or no-migration petition? [40 65.73(b)(10)]
	Yes	No	NA
	Do land d case-by-ca	isposal units rec se extension me	eiving wastes covered by a national capacity variance or eet the requirements in 40 CFR 268.5(h)(2)?
	Yes	No	NA
	If the faci reports to	lity has a case-by	y-case extension, is progress being made as described in administrator?
	Yes	No	NA
6.	Are restri	cted wastes plac	ced in underground injection wells?
	Yes	No	List

Other	wastest	reams						
1.		he facility generation of the second desired the se	erate was	tes other	than residi	ues from R	CŔA	
	Yes 🕌	No_	_	(If No, g	o to H.)			
2.	On-Sit	e Managemen	t			,	~	
	<b>a.</b>	If characteris Water Act, h restriction, ho pursuant to a 22662]	ave the foow restriction NPDE	ollowing b eted waste S permit a	een docur is are man are not pro	nented: the aged, and w	e determina hy wastes d	tion of ischarged
	·	Yes	No	_ ]	NA			
•	b.	If characteris non-hazardo treatment sta	us, are th	e wastes i	nanaged a	s restricted	units to ren until 40 CF	der them R Part 268
		Yes	No	_	NA			
		*This applies 268.41 and 268 treatment belo	3.43, and 1	to some 40	.CFR 268.42	required me	thods which r	ed in 40 CFR esult in
3.	Off-Si	te Managemer	nt: Waste	Exceeds	Treatmen	ıt Standard	S	
	Are wa	astes that exce	ed treatn	nent stand ipped to a	lards/proh an off-site	ibition leve treatment (	ls (not subje or storage fa	ect to a scility?
	Yes _	No _		(If No,	go to 4.)		:	
	Identi shippe	fy wastes code ed.	(s) and o	ff-site trea	atment or	storage fac	llities to whi	ch wastes are
	Waste	: Code	Receiv	ring Facili	ty			
	<u></u>					·		
		DR notification y? [40 CFR 26			ch shipme	nt to the tr	eatment or s	storage
	Yes _	No_		(If No,	go to 4.)			

**G.** .

	If altern require	native treatme d in 40 CFR 2	ent standard 68.7(a)(7) c	s are specifie or (8) include	d for lab ped with the	packs, is the certifice notification?	cation
	Yස	_ No _	N	A			
4.	Off-Sit	e Managemen	nt: Wastes N	Aeets Treatn	nent Stand	dards	
,	<b>a.</b>	Are wastes the off-site dispo		atment stand	lards/prob	libition levels shipp	ed to an
V		Yes	No	(If No	o, go to 5.)	,	
		Identify wast	e code(s) ar	nd off-site dis	sposal faci	lities:	
		Waste	<u>Code</u> <u>F</u>	Receiving Fac	cility		
			<u> </u>				
						ded for each shipm .68.7(a)(2)(ii)]?	ent to the
		Yes	No	(If No	o, go to b.	)	
	b.			s which have pped to a Su		dered non-hazardo	ous (in a
		Yes	No	NA_	(Ii	No or NA, go to 5	(.)
		Complete tl	he following	table:			
		Waste	: Code	Receiving Fa	acility		
	~N _b	Are a notifi Administra	ication and a tor or autho	a certification rized State?	n for each [40 CFR	shipment sent to the 268.9(d)(1) amd 26	ne Regional 58.7(b)(5)?
		Yes	No			•	

5.	Off-Sit	e Management: Wastes Subject to Variances, Extensions, or Petitions
	a.	Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?
		Yes No (If No, go to 6.)
		Complete the following table:
		Waste Code Receiving Facility
•		
	b.	Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]
		Yes No
6.	Dilutie	on Prohibition [40 CFR 268.3]:
	a.	Are prohibited* wastes with different treatment standards mixed?
		*See Appendix E for distinction between restricted and prohibited wastes.
		Yes No (If No, go to b.)
		List the wastes
		Are the wastes amenable to the same type of treatment? [55 FR 22666]
		Yes No
		Comments
	b.	Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]
	b.	Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]  Yes No (If No, go to c.)
		them non-hazardous? [55 FR 22665-22666]

c.	Managed in treatment systems regulated under the Clean Water Ac Non-toxic* characteristic wastes Treatment standard specified in 40 CFR 268.41 or 268.43  *Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cand sulfides). [55 FR 22666]  If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.  Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268/3(a)]  Yes No  Comments  mments, Concerns, or Issues Not Addressed in the Checklist:
c.	If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.  Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequat treatment? [40 CFR 2683(a)]  Yes No  Comments
c.	Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequat treatment? [40 CFR 2683(a)]  Yes No  Comments
	Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequat treatment? [40 CFR 268/3(a)]  Yes No  Comments
	circumstances, are prohibited wastes diluted as a substitute for adequat treatment? [40 CFR 2683(a)]  Yes No  Comments
	Comments
	•
Additional Cor	mments, Concerns, or Issues Not Addressed in the Checklist:
	·
	·
4,	

## RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information			1 .		1	
Facility:				enkel	(orp	
U.S. EPA ID No.:		0576				
Street:	321	00 STEP	HENSON	ate: MI Z	AY	
City:	Madi	son Hyts	St	ate: MI Z	ip:4807	' <i>/</i>
Telephone:	313		- More-armanagan		TOWNSON TO THE TAXABLE PARTY.	
&						
Inspection Date:	2 129	<u>¶</u> / Time	: 109	(am/pm)		
Weather Conditions:						
	Name		Agency/Tit	le Ta	elephone	
¥		1BAMAH	Mor	_	3 953	0241
Inspectors:	<u> </u>	7,000,1				0011
Facility Representativ	es: Tre	unge 6	eyer		-	
See Appendix B to det	termine which	of the followin	g LDR waste o	categories the	acility manag	ges:
	<u>Generate</u>	Transport	<u>Treat</u>	<u>Store</u>	Dispose	
F001-F005 Solvents	3,45,			90 de	1 St.	345
F020-F023 and F026-F028	<del></del>		MA PERSONAL			
California <b>List</b> *		the state of the s				
First Third [40 CFR 268.10]						-
Second Third [40 CFR 268.11]		· · · ·			<del></del> .	
Third Third [40 CFR 268.12]		Chiadras by the state of the st			· •	
* See Appendix A	(Wro	w w	aste)			

	INSPECTION SUMMARY								
Processes That Generate LDR Wastes:									
•									
	,								
LDR Waste Management:									

Summary:

Signature:

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

S.E. MICHIGAN FIELD OFFICE Waste Management Division 505 W. Main Northville, MI 48167

March 16, 1989

Mr. Greg Beyer Technical Manager Analytical & Support Parker & Amchem 32100 Stephenson Hwy. Madison Hgts., MI 48071

Vh"+

RE: MID 057676124

Dear Mr. Beyer,

On February 15, 1989, an inspection was conducted at your facility located at 32100 Stephenson Hwy., Madison Hgts., MI. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

As a result of that inspection, it has been determined that your facility is in violation of the following requirement(s):

 Land Disposal Restrictions. As a generator of California list waste (pH<2), you have not determined if your waste is restricted from land disposal nor the appropriate treatment standard. Also, you have not provided notice, in writing, to the treatment facility. 40 CFR 268.7.

The notice must include the EPA hazardous waste number, corresponding treatment standard, manifest number associated with the shipment of waste and waste analysis data, where available.

 Containers of hazardous waste were not placed in the storage area in such a way that adequate aisle space was maintained. Page 2, 3-16-89 Parker & Amchem RE: MID 057676124

The facility should allow enough aisle space so that a person can inspect all containers and place containers so that all dates and labels are visible.

Also, containers of hazardous waste were not always inspected weekly for leaks and defects. 40 CFR 265.174.

3. We are conducting financial reviews for interim status facility. I have not yet received a copy of the facility financial assurance mechanism for closure cost and liability coverage. 40 CFR 265 Subpart H. Please submit those documents to our office as soon as possible.

We request your response by April 17, 1989 documenting your corrective actions to these violations.

If you have any questions, please contact me at (313) 344-4670.

Sincerely,

Jayl Mitchell

Faye Mitchell

Environmental Quality Analyst

FM:bs Enclosure

cc: B. Okwumabua

STATE OF MICHIGAN



RESOURCES COMMISSION THOMAS J. ANDERSON MARLENE J. FLUHARTY STEPHEN V. MONSMA

O. STEWART MYERS DAVID D. OLSON RAYMOND POUPORE HARRY H. WHITELEY

NAT

JAMES J. BLANCHARD, Governor

## DEPARTMENT OF NATURAL RESOURC

Gordon E. Guyer, Director Waste Management Division 505 W. Main Northville, MI 48167

June 11, 1987

Parker Chemical Co. 32100 Stephenson Hwy. Madison Hgts., MI 48071 ATTN: George J. Beyer, Mgr.

Technical Support Dept.

RE: MID 057676124

Dear Mr. Beyer,

This letter is to acknowledge receipt of your letter dated June 1, 1987 indicating your compliance program for deficiencies cited during my inspection on May 14, 1987. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please contact me at (313) 344-4670.

Sincerely

Faye Dade

Environmental Quality Analyst

FD:bs

cc: U.S. EPA, Region V

B. Okwumabua



PARKER CHEMICAL COMPANY

June 1, 1987

RECEIVED

JUN 02 1987

Ms. Faye Dade
Environmental Quality Analyst
MICHIGAN DEPARTMENT OF NATURAL RESOURCES
Waste Management Division
505 West Main
Northville, MI 48167

HAZARDOUS WASTE DIV

Reference: MID 057676124

Dear Ms. Dade,

In response to your letter of May 20, 1987, following your RCRA inspection of our facility, we will comply with Title 40, Code of Federal Regulations 268.7 (a) (1) as follows.

Future F-Solvent waste disposals from this facility will be through a licensed disposal contractor; however, we (Parker CHemical Company) will notify, in writing, the treatment facility of the applicable information, i.e.:

- (i) EPA Hazardous Waste Number;
- (ii) The corresponding treatment standard;
- (iii) The manifest number associated with the shipment of waste; and
- (iv) Waste analysis data, where available.

This information will be attached, as an addendum, to the Hazardous Waste Manifest when the listed waste leaves this facility.

If you have any further questions (or comments) concerning this matter, please contact me at (313) 583-9300, x. 2364.

Very truly yours,

PARKER CHEMICAL COMPANY

George J. Beyer, Manager Technical Support Department

GJB/mjh

cc: R. Walker

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

1AS J. ANDERSON ENE J. FLUHARTY STEPHEN V. MONSMA O. STEWART MYERS DAVID D. OLSON RAYMOND POUPORE HARRY H. WHITELEY



JAMES J. BLANCHARD, Governor

#### **DEPARTMENT OF NATURAL RESOURCES**

MOK96 MIXOX MINCROM XOX 363636

Gordon E. Guyer, Director Waste Management Division 505 W. Main Northville, MI 48167

May 20, 1987

RECEIVED

U.S. EPA, REGION V WASTE MANAGEMENT DIVISION OFFICE OF THE DIRECTOR

JUN 2 9 1987

SOLID WHOLL DIMINGH U.S. EPA, REGION V

RE: MID 057676124

ATTN: George Beyer

32100 Stephenson Hwy. Madison Heights, MI 48071

Dear Mr. Beyer,

Parker Chemical

On May 24, 1987, acting as a representative of the United States Environmental Protection Agency under the provision of the Resource Conservation and Recovery Act (RCRA) state authorization, I performed an inspection of your facility located at the above address. The purpose of this inspection was to evaluate compliance of that facility with the requirements of RCRA F-Solvent Land Restriction.

As a result of that inspection, it has been determined that you may generate and disposed off-site, F-solvents wastes. Therefore, the facility will need to comply with the following requirement:

1. For each shipment of restricted waste, the generator must notify the treatment facility (including recyclers) in writing of the approporate treatment standard. The notice must include the EPA waste number, applicable treatment standard, manifest number and waste analysis data, if available. 40 CFR 268.7 (a) (1).

If the F-solvent waste meets treatment standards, the generator must provide the disposal facility with the above information and a certification that the waste meets treatment standards.

We request your response by June 15, 1986 on the above matter. If you have any questions, contact me at (313) 344-4670.

Sincerely,

Faye Dade

Environmental Quality Analyst

FD:bs Enclosure

cc: U.S. EPA, Region V

B. Okwumabua

ID Number: MID 057676 12	cal
ID Number: MID 05767612	4
Tuebeccor: F. DAO	
Date: May (4, (47)	

# DRAFT RCRA F-SOLVENT LAND RESTRICTION TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

4	FACI	LITT IDENT	IFICATION						
Δ	bt	irker (	Chemical		321	00 24	ephens	in Hw	y r identifier)
n.	B					В.	Street	(or othe	r identifier)
c.	MA City	disun H	eights	D. State		486	7/ Code	F	Opkland County Name
	0	. 7	MILE		41				county Name
G.	Natu	re of busi	MOTE !	Finishing (	-nem 10	CPIC			
# B			ness, Identii	ication or ope	rations				
H.	EPA	1005	767610	14					
ī.	Faci	2 ears e lity Conta	Beyer ct (Name and	3 i> Phone Number)	- 583-	1300			
II.A		For onsit	e facilities	complete the	20				
		011321	c raciffices,	complete the	generato	r check	list		Comments
B	•	General F	acility Stand	ards					
1.	Was Par	waste ana t 268 requ	lysis plan re irements [264	evised to cover	? Yes	No	howe neces	LUPT, MA	in not be
2.	pnys	facility sical anal 4.13(a)/26	ysis of waste	entative chemics and residues	cal and	No	ä		26
	<b>a.</b> .	Did testi constitue	ng include an	alyses for all	F001-F0	05 No	When 1	appror.	ate
\	b.	Were anal	yses performe	d using TCLP?					
	c.		yses conducte	d onsite or of	fsite (i		directl	y to C	concill.
	d.		frequency of						
	•.\	Describe discrepan		ed to identify			4	ä	
					-		* *		
3.	Are	the opera	ting records, omplete [264.	including anal	lyses an	d No			

		Facility Name: Pocker Che ID Number: Inspector: Date:
St	orage [268.50]	Comment
<b>a</b> .	Were restricted wastes exceeding treatment standards stored?	No
	If no, go to "D."	
b.	Are all containers clearly marked to identify content and date(s) entering storage?  Yes	y No
с.	Do operating records track the location, quarant dates that waste exceeding treatment star entered and were removed from storage?  Yes	ndards
d.	Do operating records agree with container lab	beling? No
e.		d for No
	If yes, can you show that such accumulation in necessary to facilitate proper recovery, trea or disposal?  Yes	is not atment,
	If yes, state how:	
1.	Were tanks emptied at least once per year, an operating records show that volume of waste r from tanks annually at least equals tank volu—Yes	nd do removed ume? No
8.	Was/is waste exceeding treatment standards st for more than one year?  Yes	ored No
	If yes, state the owner/operator's proof that storage was solely for the purposes of accumu of such quantities of hazardous waste as are necessary to facilitate proper recovery, trea or disposal:	lation the the transfer of the
h	Are F-solvent wastes exceeding treatment stan "stored" in surface impoundments? Yes	dards No
Trea	atment in Surface Impoundments [268.4]	
Were plac	e FOO1-FOO5 wastes exceeding treatment standar ced in surface impoundments for treatment? Yes	ds No

TSDF-2

Inspector: F. DODE

Address: 505 W Main

Northwilk MT 48147

Telephone No: 313-344-4670

# RCRA LAND RESTRICTION F-SOLVENT GENERATOR CEECKLIST

- NAMPLER II	PENTIFICATION			
A. Handler Na	n Height MAT	34100	Stephens	in Hul
c. Madis	n Heights MT B. Since	4	Street (or 6	other identifier
G. Nature of	Metal Finshing Ch Business; Identification of Open	emicels	p Code	F. County Name
H. EPA ID #	Se Beyer 31.  Se Clark (Name and Phone Number)	rerious		
Geov I. Handler Cor	Se Beyer 31.  Ract (Name and Phone Number)	3-583-93	SO	
	COMPLIANCE			
	Identification			
1. Does t	he handler generate the following	ng vastes?		
a. F001 b. F002 c. F003		Yes No Yes No Yes No		
If an	FOO3 wastestream listed solely f stricted solid or hazardous wast pility characteristic?		ty has been mix	ed with a
d. F004		CHARLES COMMITTEE COMMITTE	and the state of the	e exhibit the
e. F005		Yes No		
2. Source other (	of the above: Form 8700-12 specify) Lown Knowledge	; Part A	; Part B;	
ppendix A is in hether the faci	tended to assist the inspector lity is generating F-solvent valuesly. If you are concerned urn to Appendix A. Note concern	and enforcements tes. If such		
	Continue Con	19 DETON:		

			Handler Name: ID Number: Inspector: Date:
3.	BC	AT Treatability Group - Treatment Standards Ide	entification Common
	1.	Did the generator correctly determine the appropriate treatability group [268.41] of the vaste (Vastevaters containing solvents, pharmaceutical vastevaters containing spent methylene chloride, all other spent solvent vastes)?	e during inspection
С.	Va.		No ·
		Did the generator determine whether the waste exceeds treatment standards based on [268.7(a	)]:
		a. Knowledge of wastes	No Listed worste.
		b. TCLP	No
		c. Other (specify)	
		If knowledge, note how this is adequate:  product is pure solvent, but Aske is sam	<b>«</b>
		If determined by TCLP, provide date of last to frequency of testing, and attach test results.	
		Dates/frequency:	
		Note any problems:	
		d. Vere vastes tested using TCLP when a proce vastestream changed?Yes	ss or No
	2.		No
	3.	Did the generator dilute the vaste or the trea residual so as to substitute for adequate trea [268.3]	tment
) .	Mana	gement	
	1.	Onsite management	
		a. Were F-solvent wastes managed onsire	No

			Handler Name: ID Number: Inspector: Date:	Parker Chancial
	For vastes that exceed treatment treatment storage, and/or dispo	sal condu Yes	s, ves cted?	Cossents
	TSDF Checklist Bust be completed	and the second second		
e.	Are test results maintained in trecord [264.74(b)3/265.73(b)(3)]	?	ing	
2. Offs	ite Hanagement	Yes	<u> </u>	
<b>&amp;</b> .	If F-solvent vestes exceed treats did generator provide treatment [268.7(a)(1)]:	ment stand facility	ierds,	
(1)	EPA vaste number?	Yes		
(ii)	Applicable treatment standard?			
	) Menifest number?	Yes		· <del></del> .
	Vaste analysis data, if availab	le? Yes	······································	
Ensca	offsite treatment facilities Pe	tro-chen	1	
_	f F-solvent wastes did not exceed tandards, did generator provide acility [268.7(a)(2)]:	d treatmenthe dispen	nt sal	
<b>(1)</b>	EPA Hazardous vaste number?	105	• <b>No</b>	
(ii)	Applicable treatment standard?	Yes		
	Ment for a number of			
(iv)	Veste enelysis date, if available		- No	
(v)	Certification that waste meets	Yes		
Identify : certified	land disposal facilities receivin	g the BDA		

			\$ ************************************	andler Name: D Number: nspector:	Proker Chemical
	е.	If vaste is subject to nat; [268.30] (e.g., solvent-verthan 1%), case-by-case exterestion [268.6] does generate disposer that vaste is edisposal restrictions [268.6].	ter mixtures less ension (268.5) or fator provide not		Comments
•	Storage	of F-Solvent Veste	449,411,000		
	www.	F-solvent vaste stored for s (after variance 180/270 da 3.50(a)(1)]?	ys for SQG)		
			√Yes	•	
	If yes,	vas facility operating as a or final permit?	TSD under inter	l u	
f ye	s, TSDF	Checklist must be completed	·		
X		ot Using RCRA 264/265 Exempt pollers, furnaces, distillat er treatment tanks, etc.)	Units or Procession units,	305	
	Vere (refrom RCR	atment residuals generated A 264/265 exempt units or s?		· .	
	•	~ · ,		No	•
	ır yes,	list type of treatment unit	and processes		
e i	nspector	els from a RCRA-except treas e ewner/operator is consider should determine whether ti dentification requirements.	rea a generator o	f restricted	vaste.

STATE OF MICHIGAN

Total Control

S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
"JENE J. FLUHARTY
HEN V. MONSMA
C. JEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

December 4, 1985

Mr. George J. Beyer Parker Chemical Company 32100 Stephenson Highway Madison Heights, Michigan 48071

Re: MID 057676124

Dear Mr. Beyer:

This letter is to acknowledge receipt of your letter dated November 27, 1985, indicating your compliance program for RCRA deficiencies cited during my inspection on October 31, 1985. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please feel free to contact me at (313) 459-9180.

Sincerely, Your Code

Faye Dade

HAZARDOUS WASTE DIVISION

FD:mlm

cc: U.S. EPA, Region V

B. Okwumabua



November 27, 1985

・トンド・Vドト

DEC 0 2 1985

F TARDONS WASTE DIV.

Ms. Faye Dade
DEPARTMENT of NATURAL RESOURCES
Hazardous Waste Division
Southeast Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

Re: MID057676124

Dear Ms. Dade:

Pursuant to your Resource Conservation and Recovery Act (RCRA) inspection and notification of violation on November 4, 1985, the following steps have been taken to correct our records so that the items and schedule of inspection conforms to Title 40, Code of Federal Regulations, 265.15(b)(1).

Our RCRA facility manual now has a written inspection schedule which covers the following items:

- · Fire extinguishers
- Breathing equipment (self-contained air pak)
- Communications/Alarms
- Security devices
- Dikes

This schedule includes the frequency of inspection required for each item, as well as the type of problems to be looked for in each area.

If you have any further questions (or comments) concerning this matter, please contact me at 313/583-9300, ext. 2364.

Very truly yours,

PARKER CHEMICAL COMPANY

George J. Beyer/mix
George J. Beyer, Manager

Technical Support Department

GJB/mih

STATE OF MICHIGAN



S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

November 4, 1985

Mr. George Beyer Parker Chemical Company 32100 Stephenson Highway Madison Heights, MI 48071

Re: MID 057676124

Dear Mr. Beyer:

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON NENE J. FLUHARTY PHEN V. MONSMA U. STEWART MYERS

DAVID D. OLSON RAYMOND POUPORE

HARRY H. WHITELEY

On October 30, 1985, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 32100 Stephenson Highway, Madison Heights. The purpose of this inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of subtitle (c) of RCRA. Specifically, the following was found:

Though you have developed and maintained an inspection schedule at the facility pursuant to 40 CFR 265.15, general inspection requirements, the records do not identify those specific items inspected as specified in 40 CFR 265.15 (b)(1).

You are requested to respond to this letter by December 2, 1985, providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,

Faye Dade

Hazardous Waste Division

Joye M. Gode

FD:m1m

cc: U.S. EPA, Region V

B. Okwumabua

enclosures

R1026-1 5/85

## RCRA INSPECTION REPORT

EPA Identification Number: M / D	03767	6124
Installation Name: PARKER	Chemical	
Location Address: 32100 S-	tephenson Hwy	
city: MAdison Heights	State: Michigan	<u> </u>
Date of Inspection 10-30-85	Time of Inspection (fro	
Person(s) Interviewed  Deorge Beyer	Technical Support	Telephone 313-583-9300
Inspector(s)	Agency/Title	Telepnone
Inspector(s)  FAYE. DADE	MONR/WAXE 940/44	Telephone 313-459-9188
	Agency/Title MONR/Watr gyalily Specalist	
	MONR/Wate Quality Specialist	
FAYE DADE	MONR/Wate Guality Specalist	313-459-9188
Installation Activity (mark only one box  Treatment/Storage/Disposal per 40 C	MONR/Wate Guality Speculist  )  FR §265.1 and/or	3/3-7/59-9/8 %  Inspection Form(s)
Installation Activity (mark only one box  Treatment/Storage/Disposal per 40 Cl Generation and/or Transportation	MONR/Wate Guality Speculist  )  FR §265.1 and/or	3/3-7/59-9/8 %  Inspection Form(s)
Installation Activity (mark only one box  Treatment/Storage/Disposal per 40 Cl Generation and/or Transportation  Treatment/Storage/Disposal (No Generation)	MONR/Wate Guality Speculist  )  FR §265.1 and/or	3/3-7/59-9/8 %  Inspection Form(s)A

#### INSPECTION FORM A

#### Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- 2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit applica	ation	process(es) (EPA Form 3510-3) I	nspection Form /	A section(s)
501	W	storage in containers		I
S02 _		storage in tanks		J
T01		treatment in tanks		J
S04 _		storage in surface impoundment		K,F
T02		treatment in surface impoundment		K,F
D83 _		disposal in surface impoundment		K,F
\$03		storage in waste pile		L
180	П	disposal by land application.		M,F
080		disposal in landfill		N, F
Т03 ]	П	treatment by incineration		0/P
. T04		treatment in devices other than tainpoundments, or incinerators	nks, surface	Ó
Other activities		-		
GENERATOR ]		,	APPENDIX	GN
TRANSPORTER ]			APPENDIX	TR

- 3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
- 4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

		Section B: GENERAL FACILI	TY STA	NDARDS:	(Part	265 Subpart B)
			YES	NO	NI*	Remarks
٦.		the Regional Administrator n notified regarding: 265.12				
	a.	Receipt of hazardous waste from a foreign source?		<del>det man an</del>	enegape-ug-	N/A
	Ь.	Facility expansion?		4		NA
	C•	Change of owner or operator?		·		NA
2.	Gen	eral Waste Analysis: 265.13				· •
	a.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u></u>		<b>Whitedrienes</b>	
	b.	Does the owner or operator have a detailed waste analysis plan on file at the facility?	$\sqrt{}$			
	c.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?		*45°0.Germann	<u>/</u>	NO offsite Waste Accepted
3.	Sec	urity - Do security measures include (if applicable) 265.14	:			
	a.	24-Hour surveillance?		-		NIA
	b	or i. Artificial or natural barrier around facility?	·			NA
		and ii. Controlled entry?				Locked shed
	C.	Danger sign(s) at entrance?	<u>/</u>	-	40	
4.	0wn	er or operator inspections: 265.15				
	a.	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?				

	b	hav	es the owner or operator we an inspection schedule the facility?	/_		
	c.	the	so, does the schedule address inspection of the following ems:			
		i.	monitoring equipment?	400-Marine 444Carcardaman		_NIA
		ii.	safety and emergency equipment?			/doe not
		iii.	security devices?			( South EA+ Specific
		iv.	operating and structural equip- ment (i.e. dikes, pumps, etc.)?		,	items inspects
		٧٠	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?			
		۷i.	inspection frequency (based upon the possible deterioration rate of the equipment)?		-	
	d.	Are ed	areas subject to spills inspect- daily when in use?	<u>/</u>	•	
	e.	an	s the owner or operator maintain inspection log or summary of er or operator inspections?	<u>/</u>		
	f.	Doe fol	s the inspection log contain the lowing information:			
		i.	the date and time of the inspection?			
		ii.	the name of the inspector?	<u></u>		
		iii.	a notation of the observations made?		Wine in the second	
		iv.	the date and nature of any repairs or remedial actions?	<u></u>		
ō.	Do perso include:		training records 55.16	4		
	ā.	Job	titles?	<u>V</u> ,	<del></del>	
	b.	Job	descriptions?	<u> </u>	نائت	Not detailed

YES NO NI

Remarks

			YES NO	NI	Remarks
	с.	Description of training?	<u>V</u>		
	d.	Records of training?	<u> </u>		
	e.	Did facility personnel receive the required training by 5-19-81?			-
	f.	Do new personnel receive required training within six months?		1	no new personnel
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?			
6.	req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.1	7		
	a.	Special handling?	<u></u>	<del>0,1</del>	
	ь.	No smoking signs?			
	C•	Separation and protection from ignition sources?	<u>/_</u>	470-жылық	-

## Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

-		
1.	Maintenance and Operation of Facility: 265.31	YES NO NI Remarks
	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	V Kemarks
2.	If required, does the facility have the following equipment: 265.32	
	a. Internal communications or alarm systems?	
	b. Telephone or 2-way radios at the scene of operations?	
	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	<u>/</u>
3.	Testing and Maintenance of Emergency Equipment: 265.33	
	a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	
	b. Is emergency equipment maintained in operable condition?	
4.	Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	
5.	Is there adequate aisle space for unobstructed movement?	<u></u>
6.	Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	V documented.

# Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

- Does the Contingency Plan contain the following information: 265.52
  - a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
  - b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
  - c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
  - d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
  - e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- 2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

V	•	

			YES NO	NI	Remarks
3.	Eme	rgency Coordinator 265.55			
	đ•	Is the facility Emergency Coordinator identified?	<u></u>	18444-1820/FIG	
	b.	Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>/_</u>		
	с.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	/_	###Qhinkassdorre##	
4.	Eme	ergency Procedures 265.56			
	at Cod	an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency occurred in 265.56?	4255144444		No emergency

NO emergency occurred yet

			3	Section E:	MANIFE:	ST SYSTEM,	RECOF	RDKEEF	ING,	AND REP	ORTING:	(Part	265	Subpart	E)
								YES	NO	NI	Remarks				
*	٦.	Use	of i	Manifest Sy	stem	265.71									
		à.	prod prod (Pai the gend	s the facil cedures lis cessing eac rticularly signed man erator with ivery.)	ted in the sending ifest be	§265.71 fo est? a copy of ack to the		** University	Wind Address of the State of th	~			<del>12-120km t</del> aamatera	<u> </u>	<u>.</u>
		b.		records of ained for 3		nipments				<u>/</u>	***************************************	20 <del>-77-21</del> -70-1-21-21-21-21-21-21-21-21-21-21-21-21-2		<del></del>	
*	2.	req	uire	e owner or ments regar ancies?						$\underline{\vee}$					
*	of	on-s	ite	ble to owne facilities waste from	that do	not	· e		÷						
	3.	0pe	rati	ng Record	265.73										
		a.	mai rec	s the owner ntain an op ord as requ .73?	erating	rator		<u></u>	· /	***********	•	·····			
		b.	con	s the opera tain the fo ormation:		cord									
			i.	The method of each wa storage, o required i Appendix I	ste's t r dispo n 40 CFI	reatment, sal as	i	1			***************************************			<b></b>	
			֧֓֞֜֝֞֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֡֓֓֓֓֡֓֓֡֓֓֓֓	The locati each hazar facility? should be to specifi if waste wby a manif	dous wa (This cross-r c manif as acco	ste within informatio eferenced est number	the on	<u>/</u>	<i></i>						
	•	***i	ii.	A map or c cell or di											

^{***} only applies to disposal facilities

			showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)			WA.	
	i	/.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	<u></u>			
	\	/•	Reports detailing all incidents that required implementation of the Contingency Plan?	/_	**************************************		
	۲	i <b>.</b>	All closure and post closure costs as applicable?		managa ·		
4.	Avail	ab'	ility of Records 265.74	,			
	Are a under inspe	- 4(	facility records required O CFR Part 265 available for ion?				The Barrel Charles Inc.
*	*Unmar	ife	ested Waste Reports 265.76				
	† S	aza Jene	the facility accepted any ardous waste from an off-site erator subject to 40 CFR 262.20 nout a manifest or or shipping er?	-		MA	
	d a	of t lesc ind	"a" is yes, provide the identity the source of the waste and a cription of the quantity, type, date received for each unmanited hazardous waste shipment.				

YES NO

NÎ

Remarks

^{**} Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

8.	an g wati	the owner or operator developed outline of a comprehensive grounder quality assesment program that capable of determining: 265.93				
	â.	Whether hazardous waste or hazardous waste constituents have entered the groundwater?	700	**************************************	·	
	b.	The rate and extent of migra- tion of hazardous waste or hazardous waste constituents in the groundwater?		*******		
	C.	The concentration of hazardous waste or hazardous waste constituents in the groundwater?		***************************************	******	
<b>*</b> 9.	a si wat	the owner or operator performed tatistical analysis of his grounder monitoring data as required in .93(b)?	-		<u> </u>	
10.	inc	there a statistically significant rease (or pH decrease) detected in well?			<u> x</u> ·	
	ã.	If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?			<u> </u>	
		Skip to number 14				
11.	writ	the owner or operator prepared a tten groundwater monitoring waiver onstration for the facility?	-			-
	ā.	Is the waiver demonstration maintained at the facility?	O		Alone and	
	b.	Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?				
Note:	Ĭı	aspectors should request a conv				

YES NO

NI

Remarks

Note: Inspectors should request a copy of the waiver document.

c. Skip questions 12, 13, and 14.

^{*}These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

				Section G	JLOSURE AND P	OST C	_OSURE	(Part	√5 Subpart G)
						YES	NO	NI	Remarks
١.	Clo	sure	265	5.112					
	ā•			acility clos ilable for i		<u> </u>			
	b.	Doe	s the	plan identi	fy:		7		
		i.		mum extent u facility lif	nclosed dur- e?	$\checkmark$	<i></i>		
		ii.	maxi vent	mum hazardou ory?	s waste in-			-	
		iv.	estin	mated year o	f closure?	i/	/		
		٧.	sche	dule of clos	ure activities?			-	
	c.	Has	clos	ure begun?		******	1/		
2.	Pos	t-Cl	osure	<b>26</b> 5.118					
٠	ā.			ost-closure ection?	plan available	<del>*************************************</del>	and Colombins	-	NA
	b.	Doe	s this	s plan conta	in:				
		i.	monit	ription of g toring activ uencies?		N <del>o de more.</del>			
		ii.		ription of m vities and f					
			AA.	cover, or c	f cap, final ontainment where appli-		444-Permaninens		
				facility moment	nitoring equip-				
	i	ii.	name, of pe	, address, a erson or off	nd phone number ice to contact ure care period			ADP TO THE STATE OF THE STATE O	
	C.	Has	the p	ost-closure	period begun?				
	d.			ritten post- available?	closure cost 265.144	·	•	who are a second and a second a	

### Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

YES NO NI Remarks 1. Are containers in good condition? 265.171 2. Are containers compatible with waste in them? 265.172 Are containers managed to prevent leaks? 265.173 Are containers stored closed? 5. Are containers inspected weekly for leaks and defects. 6. Are ignitable and reactive wastes stored 265,776 at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177 8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

#### Section A: Scope

Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage. or disposal.

Section B:	MANIFEST	REQUIREMENTS	(Part	262,	Subpart	B)	Ì

			YES	МО	NI	Remarks
(1)		s the operator have copies of the manifest ilable for review? 262.40	<u></u>		-	
(2)	mon	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.	<u>}_</u>			
(3)	fol cop fes	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manities) that do not contain the critical ments). 262.21		/		
	a.	Manifest document number?	<u> </u>			
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	$\underline{\nu}$	_	¥	
	C.	Name and EPA ID Number of Transporter(s)?	1		-	
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	$\underline{\vee}$			
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	$\underline{\nu}$	_		VENTTO PROTECTION AND ADMINISTRATION OF THE
	f.	The total quantity of waste(s) and the type and number of containers loaded?	<u>/</u>			
	g.	Required certification?	1/			
	h.	Required signatures?	4			
(4)	Rep	ortable exceptions 262.42				
	a	For manifests examined in 12\ leveent for	chinmo	inte i	iithin.	the last 35 days

- For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.
- b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administra-

## Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C) YES NO Remarks ΝĪ Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30 2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32 3. If required, are placards available to transporters of hazardous waste? On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box land skip to Section D. If the installation elects option B, complete the following observa-See 40 CFR 262.34 January 11, 1982 Revision tions: Is each container clearly marked with the start of accumulation date? b. Have more than 90 days elapsed since the date inspected in (a)? c. Do wastes remain in accumulation tanks for more than 90 days? d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D) YES NO NI Remarks 1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40 Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E) 1. Has the installation imported or exported Hazardous Waste? 262.50 (If answered Yes, complete the following as applicable.) Exporting Hazardous waste; has a

generator:

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION THOMAS J. ANDERSON F. R. CAROLLO OB A. HOEFER EPHEN F. MONSMA HILARY F. SNELL

PAUL H. WENDLER

HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

Hazardous Waste Div 1120 W. State Fair Detroit, MI 48203

#### DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING BOX 30028 LANSING, MI 48909

RONALD O. SKOOG, Director

June 28, 1984

Parker Chemical Company 32100 Stephenson Hwy. Madison Hts., MI 48071

EPA ID No: MID 057676124

Dear Mr. George Beyer:

This letter is to acknowledge receipt of your letter dated June 21, 1984 indicating your compliance program for RCRA deficiencies cited during my inspection on May 23, 1984. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have questions regarding Hazardous Waste Management please feel free to contact me at (313) 368-3335.

Sincerely, HAZARDOUS WASTE DIVISION

Laura Lodisio

DETROIT DISTRICT OFFICE

LL:pf

cc J. Bohunsky

B. Okwumabua

U.S. EPA

- Carlons Garage 170 W. Str.

100 mm . 21 mm

- 12 t 37 80"

STORTS



428/R

#### PARKER CHEMICAL COMPANY

32100 STEPHENSON HIGHWAY MADISON HEIGHTS, MICHIGAN 48071 313/583-9300

June 21, 1984

Ms. Laura L. Lodisio
Department of Natural Resources
ENVIRONMENTAL PROTECTION BUREAU
1120 W. State Fair Avenue
Detroit, MI 48203

Reference: EPA I.D. No. MID057676124

Dear Ms. Lodisio,

I have listed below (referencing your numbers) the actions which have been taken to correct the RCRA, Subtitle C, violations found at our Madison Heights facility during the RCRA inspection on May 23, 1984.

#### Items 1 & 2

A training program has been developed for all of the facility employees who handle, or are involved with, our waste. This is being given in two sessions (June 21 & 26, 1984). Following the training sessions, the Personnel training records will be updated.

#### Item 3

All of the waste drums in this area have been properly identified and labeled as "Hazardous Waste".

#### Item 4

An inventory list is now available in the RCRA log book which indicates the waste name and quantity at each storage area.

#### Item 5

Copies of the revised Contingency Plan, dated April 19, 1984, were sent on June 13, 1984, to the local emergency response agencies (Fire Department, Police Department, William Beaumont Hospital - Troy).

If further documentation, or clarification, is necessary, please contact me at 313/583-9300, x.2364.

Very truly yours,

PARKER CHEMICAL COMPANY

George U. Beyer, Manager, Technical Support Department STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL PROTECTION BUREAU 1120 W. State Fair Avenue Detroit, Michigan 48203

#### DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING BOX 30028 LANSING, MI 48909

RONALD O. SKOOG, Director May 31, 1984

Parker Chemical Company 32100 Stephenson Hwy. Madison Hts., MI 48071

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON

OB A HOEFER

HARRY H. WHITELEY

R. CAROLLO

HILARY F. SNELL PAUL H. WENDLER

EPA ID No: MID 057676124

25-30-6

Dear Mr. George Beyer:

On May 23, 1984, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 32100 Stephenson Highway, Madison Heights, MI to evaluate compliance of that facility with the requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of the requirements of subtitle C of RCRA. Specifically, the following was found:

1) Facility personnel have not taken part in an annual review of training (last training session was July, 1982) as required per 40 CFR 265.16(c).

2) Personnel training records and documents are not current (pending annual review) as required per 40 CFR 265.16(d).

3) While being accumulated on-site each container is not labeled or clearly marked with the words "Hazardous Waste" as required per 40 CFR 262.34(a)(3). This is of primary concern in the collection area which you identify as Waste Drum Storage Area No. 3. Because of the various types of waste being collected in this area and the fact that other drums which contain product are stored here it is of prime importance that these wastes are clearly identified to avoid any possibility of a problem from inadvertent mixing, etc...

4) The operating record must contain an inventory documenting the location of each hazardous waste within the facility and the quantity at each location. It is noted that there were several drums in storage area number 1, which were not inventoried because they were not yet identified. Also, please be advised that any of the drums taken from the collection points (Areas 2,3,4) and put into storage should be immediately added to this inventory. The drums should be inventoried as soon after they are filled as possible and moved to the contained storage shed (Area 1).

Parker Chemical Company May 31, 1984 page two

5) Copies of the recent (April 19, 1984) revisions to your Contingency Plan have not yet been submitted to the local emergency response agencies as required per 265.53.

You are requested to respond to this letter by June 25, 1984, providing documentation to this office regarding those actions taken to correct these violations. Please send your response to the address in the upper right corner of page one of this letter.

If you have any questions regarding this matter, please feel free to contact me at (313) 368-3335.

Sincerely,

HAZARDOUS WASTE DIVISION

Laura Lodisio

DETROIT DISTRICT OFFICE

LL:pf Enclosure

cc J. Bohunsky K. Burda EPA RCRA Inspection Report

EPA Identification Number: 1120	57676124
Installation Name: PARKER CHEMICAL	
Location Address: 32100 STEPHER	ISON HWY.
City: MADISON 475. State:	MICHIGAN 48071
Date of inspection: <u>05-23-84</u> Time of	inspection (from) $\frac{2:00}{(to)}$ (to) $\frac{3:30}{(to)}$
Person(s) interviewed Title	Tel ephone
GEORGE BEYER TECH. SU	1880RT MGR. (313)358-930C
Inspector(s)  CAULA COOISIO  Agency/T  MONE	itle Telephone - PESCURCE (3/3)368-3335 SPECINCIST
Installation Activity (mark only one box)	Inspection Form(s)
Ireatment/Storage/Disposal per 40 CFR 265. Generation and/or Transportation	1 and/or
Treatment/Storage/Disposal (no generation	or Transportation) A
I Generation and Transportation	В, С
[ Generation only	В
Transportation only	C

### Section A: SCOPE OF INSPECTION.

- 1. Interim status standards for treatment storage or disposal of HAZARDOUS MASIES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

ermit.	appli	catio	n process(es) (EPA Form 3510-3) In	spection Form /	A section(s)
	501	M	storage in containers		I
	S02	II	storage in tanks		J
	T01	II	treatment in tanks		J
	S04	П	storage in surface impoundment		K,F
	T02	II	treatment in surface impoundment		K,F
	D83	П	disposal in surface impoundment		K,F
	S03	П	storage in waste pile		L
	D81	П	disposal by land application		M,F
	D80	II	disposal in landfill	,	N,F
•	T03	II	treatment by incineration		0/P
	T04	П	treatment in devices other than tan impoundments, or incinerators	ks, surface	Q
activ	ities				
GENE	RATOR	M		APPENDIX	GN
RANSPO	ORTER	II		APPENDIX	TR
	activ	SOI SO2 TOI SO4 TO2 D83 SO3 D81 D80 TO3 TO4	S01	SO1 Storage in containers  SO2 Storage in tanks  TO1 Streatment in tanks  SO4 Storage in surface impoundment  TO2 Streatment in surface impoundment  D83 Storage in surface impoundment  SO3 Storage in waste pile  D81 Storage in waste pile  D81 Storage in landfill  TO3 Streatment by incineration  TO4 Streatment in devices other than tan impoundments, or incinerators  activities  GENERATOR	storage in containers  S02

 Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

N.A.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

502 - Line Z; no storage in tanks.

A-1 (4-82A)

# Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

			YES	NO	NI*	Remarks
1.	Has the Regional Admi been notified regard	nistrator ng: 265.12			*	
	a. Receipt of hazard waste from a fore	lous eign source?	***************************************		problem source	
	b. Facility expansion	n?	-	X	***************************************	
	c. Change of owner o	or operator?	X	-	**************************************	Notified 9-29-13. Ca
2.	General Waste Analysi	s: 265.13				still waiting to hea
	a. Has the owner or a detailed chemic analysis of the v	cal and physical	ettenopolita (seriamida		eriji	assurance. Analyze filter code. 253/40 has packs
	b. Does the owner or a detailed waste on file at the fa	analysis plan		desirations are		other waste are he based on knowledge chemicals used.
	c. Does the waste ar specify procedure and analysis of e hazardous waste t	es for inspection each movement of	strategy residents.	and an elsa	<u>×</u>	No off-site waste
3.	Security - Do securit (if applicable		:			
	a. 24-Hour surveilla or b. i. Artificial or barrier around and ii. Controlled ent	natural d facility?	×			Shed locked for
	c. Danger sign(s) at entrance?		X	Auto-according towards	And Printed And State Control of the	
4.	Owner or operator ins	spections: 265.15				
	a. Does the owner or inspect the faci malfunctions, demonstrator errors, of hazardous was may affect human the environment?	lity for terioration, and dischanges te that				

			163	NO NI KEMATKS
	hav	s the owner or operator e an inspection schedule the facility?	×	
	the	so, does the schedule add inspection of the follow ms:	iress ring	
	j .	monitoring equipment?	ghallogocoleanp	x not required
	ii.	safety and emergency equ	ipment?	(Conducted to
	iii.	security devices?	X	Maintenance
	iv.	operating and structural ment (i.e. dikes, pumps,		and you
	V.	type of problems to be I for during the inspection leaky fitting, defective etc.)?	on (e.g.	- explanation on things to be took
	, vi.	inspection frequency (bathe possible deterioration of the equipment)?		top of inspect.
		areas subject to spills daily when in use?	inspect-	
	an	s the owner or operator minspection log or summary er or operator inspection	of of	Made-water side: without discontinuous applications and personal participations are a considerable and considerable personal participations are a considerable and considerable personal participations are a considerable and considerable personal participations are a considerable personal participation and considerable personal participations are a considerable personal participation and considerable personal participations are a considerable personal participation and considerable personal participations are a considerable personal participation and considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal participation and considerable personal participation are a considerable personal personal personal personal pers
		s the inspection log cont lowing information:	cain the	
	i.	the date and time of the	e inspection? 🗶	
	ii.	the name of the inspecto	or? <u>×</u>	
	iii.	a notation of the observ	vations	
	iv.	the date and nature of a repairs or remedial act		Meltinged states distributed from an appropriate and appropria
Do pe		training records		
	a. Jol	titles?	X	Management of the state of community and the state of the
	b. Job	descriptions?	X	

			1F2	NO	NI	Remarks
	c.	Description of training?	-	×	and the same of th	Nothing since
	d.	Records of training?		X	wiffrenduces	July 1982
	e.	Did facility personnel receive the required training by 5-19-81?		×	-	
	f.	Do new personnel receive required training within six months?	-	×	***********	
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?				
6.	req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.1	7			V
	a.	Special handling?	<u>_X</u>	ester of seats	fortunase.	jantulles on
	b.	No smoking signs?	_X	-	Sint 499 et d. maile	
	C.	Separation and protection from ignition sources?		- Marian and American	Marine Control	•

# Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

١.	Maintenance and Operation			
	of Facility: 265.31	YES NO	MT	P. annual in
	Is there any evidence of fire,	IES NO	NI	Remarks
	explosion, or release of hazardous waste or hazardous			
	waste constituent?	X	P.	
2.	If required, does the facility			5.4 5 /
	have the following equipment: 265.32	**		-P.A. System.
	a. Internal communications or	X		- Co. has installed a
	alarm systems?		NAMES AND ADDRESS OF THE PARTY	Shed which Sounds
	b. Telephone or 2-way radios	×		main Bug.
	at the scene of operations?	andreade measures	<del>statisticallal</del>	- Telephones.
	c. Portable fire extinguishers,			- Fine extinguisheron
	fire control, spill control equipment and decontamination			- Absorbent pads Bills
	equipment?	X		- Absorbent pads, pilks
	Indicate the volume of water and/or foa	m available	for fir	e control miculate.
		Age of		
	- Cory over	ar Sup	yang.	
	(All and the state of the state			
3.	Testing and Maintenance of			
	Emergency Equipment: 265.33			Fise systems - outsie Contract. Sofety equipment close in-hou
	a. Has the owner or operator established testing and			Solely equipment
	maintenance procedures	- 1		done in-hour
	for emergency equipment?	<u>×</u> —	NAME AND ADDRESS OF THE PARTY O	
	b. Is emergency equipment			
	maintained in operable condition?	×		
А			As in contract of the Contract	
4.	Has owner or operator provided immediate access to internal			
	alarms? (if needed) 265.34		AND THE COLUMN ASSESSMENT	
5.	Is there adequate aisle space			
	for unobstructed movement?	X	-	
6.	Has the owner or operator attempted	(90		But need to see
	the second of the contract of			
	to make arrangements with local authorities in case of an emergency			then remember
	authorities in case of an emergency at the facility?	X	- Garding State St	then revision
	authorities in case of an emergency	<u>X</u>	<b>SATURATION</b>	

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

			YES	NO	NI	Remarks
1.		s the Contingency Plan contain the lowing information: 265.52	1		œ	
	à.	The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	X		Management	Plan was persien on April 19,1 to incorporate chy's che to chy in owners of applate in Closure con
	b.	Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	X	l':	a Consessor	Will send review. Cont. Plan.
	c.	Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X	6kd d/Manualyco	and the same of th	
	d.	A list of all emergency equipment at the facility which includes the			<b>v</b>	

evacuation routes?)

Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

of each item on the list and a brief outline of its capabilities?

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe

signal(s) to be used to begin evacuation, evacuation routes, and alternate

X _ (See 1.6.)

	112	NO	11.7	VCHIG ( K 2
Emergency Coordinator 265.55		ř.		
a. Is the facility Emergency Coordinator identified?	丛	1	and the factorina	beorge Beyer
b. Is coordinator familiar with all aspects of site operation and emergency procedures?		2	artinoscopia inplica	
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X	and the second	destignations in	
Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	American		X	No unergeorey by

		Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265	Subpart E)
		YES NO NI Remarks	
**	1.	. Use of Manifest System 265.71	
	4	a. Does the facility follow the procedures listed in §265.71 for processing each manifest?  (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)  b. Are records of past shipments retained for 3 years?	-site
		retained for 3 years?	
**	2.	2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	
**	of	Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.	
	3.	3. Operating Record 265.73	

b. Does the operating record contain the following information:

265.73?

Does the owner or operator maintain an operating record as required in

- i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?
- ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)

***iii. A map or diagram of each cell or disposal area

However need to address Stg. over.

*** only applies to disposal
 facilities

E-1

4/82-A

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

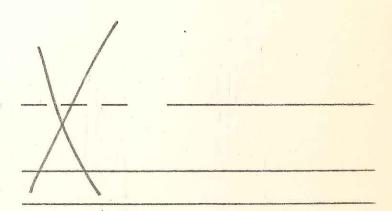
- X Not a disposal frial
- iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?
- X ____
- v. Reports detailing all incidents that required implementation of the Contingency Plan?
- ___ X Have had more
- vi. All closure and post closure costs as applicable?
- X ____
- 4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

X		

**Unmanifested Waste Reports 265.76

- a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?
- b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.



^{**} Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

## Section G CLOSURE AND POST CLOSURE (Part 265 subpart G)

YES NO NI Remarks Closure 265.112 Is the facility closure plan available for inspection? Does the plan identify: i. maximum extent unclosed during facility life? maximum hazardous waste inii. ventory? iv. estimated year of closure? X v. schedule of closure activities? c. Has closure begun? *2. Post-Closure 265.118 a. Is the post-closure plan available for inspection? Does this plan contain: i. description of groundwater monitoring activities and frequencies? description of maintenance activities and frequencies for AA. integrity of cap, final cover, or containment structures, where applicable facility monitoring equip-BB. name, address, and phone number of person or office to contact during post-closure care period? Has the post-closure period begun? Is the written post-closure cost estimate available? 265.144

happlies only to disposal facilities.

# Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		YES	NO	NI	Remarks
	Are containers in good condition? 265.171	X	-	edisamplanous jou	of Particular Control and Cont
2.	Are containers compatible with waste in them? 265.172	X	Minno-substant	error to any Assa	
3.	Are containers managed to prevent leaks? 265.173	X		Arreste State (St	
4.	Are containers stored closed?	X		No children garactural b	
5.	Are containers inspected weekly for leaks and defects.	<u>X</u>		and the second second	
	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.776 <u>X</u>	-	Аттарыны	
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	_ <u>×</u>	Shirt Standard Control of the Contro		
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	X		-manufacture	lab packs.

5	0	cti	on	A:	Scope
J	C	661	UII	M.	2000

 Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

(	or an	sposal.		
Sect	ion B	: MANIFEST REQUIREMENTS (Part 262, Subpar	t B)	
1			YES NO NI	Remarks
(1)	Does avai	the operator have copies of the manifest lable for review? 262.40	<u>x</u>	
(2)	mont	ine manifests for shipments in past 6 hs. Indicate approximate number of fested shipments during that period.	manifest	for past yes
(3)	foll copi fest	the manifest forms examined contain the owing information: (If possible, make les of, or record information from, manical) that do not contain the critical lents). 262.21		
	a.	Manifest document number?	<u>X</u>	
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	<u> </u>	
	c.	Name and EPA ID Number of Transporter(s)?	<u>X</u>	
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u>X</u>	
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	
	f.	The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	
	g.	Required certification?	<u>x</u>	mentals.
	h.	Required signatures?	<u>x</u>	
(4)	Rep	ortable exceptions 262.42	q	
J.	la.	For manifests examined in (2) (except for	shipments with	in the last 35 days),

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administra-

4/82-A

sect	100 C: PRE-TRANSPORT REQUIREMENTS (Part 202, Su	upar c	5/		
		YES	NO	NI	Remarks
	Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	X		particular to midd	
	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	X	guantenana	**************************************	
3.	If required, are placards available to transporters of hazardous waste? 262.33	X	and the second s	guana, elegiunistu	
4.	On-site accumulation of generated hazardous was waste it generates either (A) in its storage fawith 40 CFR 262.34 [see 265.1(c)(7)]. Option B and containers. If the installation elects opt to Section D. If the installation elects options: See 40 CFR 262.34 January 11, 1982 Rev	cility restr ion A, n B, c	[265] icts icts checl	l(b)J all acc this	or (B) in accordance cumulation to tanks box I and skip
	a. Is each container clearly marked with the start of accumulation date?	1	1	-	
	b. Have more than 90 days elapsed since the date inspected in (a)?	$\rightarrow$	$\langle -$	· automica-filmontia	Apple contracting to integrate principles in a contract principle directly and contract contract contract.
	c. Do wastes remain in accumulation tanks for more than 90 days?	/_	1		The first hand provided by the state of the
	d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?		ng anomaloise	0	
Sec	tion D: - RECORDKEEPING AND REPORTING (Part 262,	Subpa	rt D)		
1.	Are all test results and analyses needed for hazardous waste determinations retained for at least	YES	S NO	NI	Remarks
	three years? 262.40	X			Address designation of the state of the stat
Sec	tion E: - INTERNATIONAL SHIPMENTS (Part 262, Su	bpart 1	Ε)		
٦.	Has the installation imported or exported Hazardous Waste? 262.50	aguitaman.		<u> </u>	
	(If answered Yes, complete the following as applicable.)				
I	a. Exporting Hazardous waste; has a generator:				

emarks:	
EXP	LANATION OF AREAS NOTED
ON	PART A (PAGE 5 OF 5).
#1.	PRIMARY DIKED STORAGE AREA IN
	ENCLOSED SHED.
#2.	COLLECTION AREA FOR SM. QUANTE
	VARIOUS LAB WASTE WHERE !
	THEY ARE SORTED AND PACKED
	INTO LAB PACKS (THEN TO
	AREA #1)
#3.	- VARIOUS SOLVENT & PAINT COLLER
	APEA. DRUMS FILLED HERE
	THEN BROUGHT TO AREA #1.

#4. - I DRUM UNDER FILTER PRESS
FOR COLLECTION OF FILTER CAKE
THEN SENT TO AREA 41.

THEOREM FILTER PRESS. (SHOULD N'T

BE INCLUDED.)

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

ACOB A. HOEFER

J. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

James J. Blanchard, Governor

#### DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING BOX 30028 LANSING, MI 48909

July 27, 1983

Detroit District Office 1120 W. State Fair Ave Detroit, MI 48203 (313) 368-3335

Parker Surface Treatment Products
Occidental Chemical Corporation
32100 Stephenson Hwy.
Madison Hts., MI 48071

MID 057 676 124

Attention: George J. Beyer; Mgr.; Technical Support Dept.

Dear Mr. Beyer:

This letter is to acknowledge receipt of your letter dated July 14, 1983 indicating your compliance program for RCRA deficiencies cited during our inspection on June 14, 1983. We consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have questions regarding Hazardous Waste Management please feel free to contact me at (313) 368-3335.

Sincerely, HAZARDOUS WASTE DIVISION

Laura L. Lodisio

DETROIT DISTRICT OFFICE

LLL:pf

cc: Ken Burda

J. Bohunsky

U.S. EPA

## Occidental Chemical Corporation

July 14, 1983

Ms. Laura L. Lodisio DEPARTMENT of NATURAL RESOURCES Hazardous Waste Division Detroit District Office 1120 W. State Fair Avenue Detroit, MI 48203

RECEIVED

JUL 1 5 1983

CAN DETROIT DIST

Reference: EPA I.D. No. MID057676124

Dear Ms. Lodisio,

The violation of the requirements of Subtitle C of RCRA referenced in your letter of June 20, 1983, for our Madison Heights facility, is being corrected.

This requirement for an internal communication or alarm system for our hazardous waste storage shed will be resolved by installing an emergency button ("Panic Button") in the shed with an audible signal in the main facility in the shipping/ maintenance areas. This equipment has been ordered and installation will be complete within 30 days.

If further documentation or clarification is necessary, please contact me at 313/583-9300, ext. 2364.

Very truly yours,

OCCIDENTAL CHEMICAL CORPORATION PARKER Surface Treatment Products

George J. Beyer
Manager
Tech Technical Support Department

GJB/mz



JUL 28 1983

EPR-FIFI N STAFE

STATE OF MICHIGAN

"TURAL RESOURCES COMMISSION

JACOB A. HOEFER
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

(H-)

James J. Blanchard, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING BOX 30028 LANSING, MI 48909 HOWARD A. TANNER, Director

June 20, 1983

Hazardous Waste Divi Detroit District Off 1120 W. State Fair A Detroit, MI 4820 (313) 368-3335

Parker Surface Treatment Products Occidental Chemical Corp.

32100 Stephenson Hwy. Madison Heights, MI 48071

EPA ID No.: MID 057676124

Attention: George Beyer, Technical Support Mgr.

Dear Mr. Beyer:

On June 14, 1983, I conducted an inspection of your facility located at 32100 Stephenson Highway, Madison Heights, MI to evaluate compliance of that facility with the requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of the requirements of subtitle C of RCRA. Specifically, the following was found:

1. The hazardous waste storage area of the facility is not equipped with an internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel or a device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio capable of summoning emergency assistance as required per 40 CFR 265.32.

You are requested to respond to this letter by July 15, 1983 providing documentation to this office regarding those actions taken to correct these violations. Please send your response to the address in the upper right corner of this letter.

If you have any questions regarding this matter, please feel free to contact me at (313) 368-3335.

Sincerely,

HAZARDOUS WASTE DIVISION

Laura L. Lodisio

DETROIT DISTRICT OFFICE

LLL:pf Enclosure

cc: U.S.EPA

J. Bohunsky

K. Burda

H1026 1/80

DUN 22 1983

LEPR-FIELD STAFF

ACT 64 INSPECTION REPORT	
U.S. EPA I.D. NUMBER M L D 057676124 (or Michigan)	
FACILITY NAME PAKKER Chemical	
32100 Stephenson Hwy	_
Madisun Heights MICHIGAN 4807/	_
MAN III IGO	
THE OF INSPECTION (FROM) / (TO)	1100
PERSON(S) INTERVIEWED TITLE TELEPEO	NE
George Beyer Mymt, Technical Support 313-583-9	300
J"SPECTOR(S)  AGENCY/TITLE  TELEPEO	אב
H. DROE MONK/ B.O.A. 3B-344-4	
	4 10
Primary Eusiness of this Facility: Research L Oevelspment	
of Metal Pinishing Chemicals	
y chemical and a second	
· · · · · · · · · · · · · · · · · · ·	
Reason for Inspection:	
Routine	
INSPECTION FORMS: Follow-upCompl	aint.
	E.
Based upon the inspection, this facility: is a non-generator/conditionally exempt small quantity  generator	EM
generatortransporter	
treatment/storage/disposal facility	<u>.</u>
Date of Last Inspection 10-30-85	<del>å</del> n

.

**4**0  INSPECTION FORM D
Part 6 of Rules
P.A. 64 of 1979
TREATMENT, STORAGE, DISPOSAL FACILITY

This Facility:
Generates Hazardous Waste (Also use Generator Appendix)
Treats Hazardous Waste
Stores Hazardous Waste
Disposes of Hazardous Waste
Transports Hazardous Waste (Also use Form C)
This Facility:
Accepts wastes from off-site sources
Handles only its own wastes
If applicable, hazardous waste is stored in the following:
Drums (Containers)
Above-ground tanks
Underground tanks
Waste piles
Lagoons
Other
Not applicable
If applicable, hazardous wastes are treated/disposed in the following (Attach appropriate checklist)
Surface Impoundments
Waste piles
Land Treatment
Landfills
Incineration/Thermal Treatment
Chemical, Physical and Biological Treatment
Above-ground tanks

	ĺ	INSPECTION D	
Underground tanks	)		,
Drums			,
Other			
Not applicable			•
	WASTE STORAMS		
Hazardous Waste Code/Name	Source	Type of Storage	How Much
D00 1 / D009	moved Cab, waster	drums.	***************************************
DuoM			
POOL		+	

INSPECTION FORM D Part 6 Rules P.A. 64 of 1979

# HACAPDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITY Applies to Those Facilities That Do Not Have an Act 64 Permit

	<u>Gene</u>	ral Facility Standards				
	Kule	601, 40 CFR 265, Subpart B				77 : 7
			Yes	M7	NT / 6	Violation
		·	455	<u>No</u>	N/A	Class
1.	If r	equired, have the following been				
	noti:	fied:			*	
	a.)	Notified Director of receipt of				
	,	hazardous waste from a foreign				
		source? 265.12(a)			4	~ II
		200.12(a)		· · · · · · · · · · · · · · · · · · ·		
•	h ì	Notified Dimentary				
	J.,	Notified Director of change of owner or operator.			-1-	
		40 CER Residence			5/8/	II
		40 CFR Part 270. 265.12(b)			/* ( .	
Comme	nte.	Chance of amount				
Joinne.	1162.	Change of ownership rec	enty	$\Delta$	Qun	ed
		•				
26 40 <del>4</del>	<del></del>					
·	········					
	***************************************		·			•
2. (	Ganai	ral Wasta Assissi				
	- i	ral Waste Analysis: 265.13				
•	a.,	Has the owner or operator obtained				
		a detailed chemical and physical				I
		analysis of the waste? 265.13(a)				*
1.	L \	· · · · · · · · · · · · · · · · · · ·	<del></del>		241000	
t	b.)					
		detailed waste analysis plan on				<del>-</del>
		file at the facility? 265.13(b)	1			I
			1	-		40-000-00-00-00-00-00-00-00-00-00-00-00-
C	c.)	Does the waste analysis plan				
		specify procedures for inspec-				•
		Thon and analysis of each move-				
		ment of hazardous waste from off-				_
		site? 265.13(c)				I
				-		
cmmer	its:					
				·	·	
						_
	**************************************					
		1				
					<del></del>	and the same of th

					C-				
						Inspe	CTION	FORM	D Violation
3.	Secur	tity -	If applic	able, do	security	Yes	<u>No</u>	N/A	
	measu	res in	iclude:			_	Secu	aity Myse	о Т
	a.)	24-hou	ır survei] or	llance? 2	865.14(b)(1)		alpha —	8 Rober	W, -
	b.)		rtificial		eal barrier (5.14(b)(2)(	i)			
	i	ii. C	ontrolled		265.14(b)(2)	(±±)	and the same of th		I
	c.)	Dange:	r sign(s) 4(c)	at entra	ince?		Loc	Ked Sheck	I
omm	ents:				T-1111	<del></del>			
		<del>" </del>		San de la companya d					
4.	Owner a.)	Does spect deter disch may a	the owner the facil ioration,	or operality for operator operator operators and the contract of the contract of the contract operators on the contract of the contract of the contract operators on the contract of the contract operators on the contract of the contr	malfunction errors, an waste that or the	.s, .d	***************************************	<b>Northead Section</b>	Iï
	ъ.)	a wri	the owner tten inspe acility?	ection so	chedule at	<u></u>	de Tibe	<del>Palled Market</del>	II
	c.)		nspection		le address following	,			
		i.	Monitori: 265.15(b		ment?			<del></del>	II
		ii.	Safety a equipmen		ency	<u>/</u>			II
		iii.	Security	devices	? 265.15(b)(	1)/	<del>Di</del> n	45.0-1	II
		iv.	Operatin equipmen	g and st	ructural dikes, pumps	/		Walder-op-	II

^{*} These violations are Class II, unless observations of hazardous conditions or violations are noted in the log and not corrected which result in the release or actual harm to the environment or human health; in such instances violations are Class I.

				II	INSPE	INSPECTION		
			· · · · · · · · · · · · · · · · · · ·	,	<u>Yes</u>	<u>No</u>	<u>N/A</u>	Violation <u>Class</u>
			Type of problems to be look for during the inspection (e.g. leaky fitting, defect pump, etc.)?			WEF-UDdrom.ms		II ——
		vi.	inspection frequency (bases upon the possible deterior rate of the equipment)? 265.15(b)(4)	d ati	.cn		**************************************	II
	ā.)	spe	areas subject to spills incted daily when in use?	-		<i>-</i>		II
	e.)	tai	s the owner or operator main n an inspection log or summa owner or operator inspection	arv			-	II ———
	f.)	tne	the inspection log contain following information: .15(d)	n	•			
		i.	The date and time of the inspection? 265.15(d)		V		***********	II
		ii.	The name of the inspector? 265.15(d)		<u> </u>	all proposession and deline	****	II
		iii.	A notation of the observations made? 265.15(d)	1		THE PROPERTY AND ADDRESS OF THE PARTY AND ADDR		II
		iv.	The date and nature of any repairs or remedial actions 265.15(d)	s?	· .	**************************************		II
omm	ents:	<del></del>		<del></del>		***		O+100
	······································				·	······································		LOW.
			` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` `	<del></del>				
5.	Do pe	ersonne	el training records include:	•	10H2			
	a.)	Job ti	tles? 265.16(d)(1)		<u></u>			I
	b.)	Job de	escriptions? 265(d)(2)		<u></u>	<del>~~</del>	-	I ————
	c.)	Descri 265.16	ption of training? S(d)(3)		V	-		I

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No. 1 Company of the 
	d.)	quired training within eigh	INSPEC	No howe	<u>N/A</u>	Violation Class II
Comm	f.) ents:	months? 255.15(d)	✓	101.8	T6	I I
6	If re	equired, are the following special				
	incom 265.]	special handling? 265.17(a)  No smoking signs? 265.17(a)		META-mappy		I I I
Comme	ents:					
	ous w	PREPAREDNESS AND PREVEN Rule 606, 40 CFR 265, Sub ere any evidence of fire, explosion lease of hazardous waste or hazard- aste constituents 40 CFR Rule 265.3	part C	✓.		I

				ECTIO		
			Yas	No	N/A	Violation <u>Class</u>
2.	the i	equired, does this facility have following equipment: 40 CFR 265.32				
	a.)	Internal communications or alarm systems. 40 CFR 265.32(a)			101-	I.
	b.)	Telephone or 2-way radios at the scene of operations. 40 CFR 265.32(b)	<u> </u>		The state of the s	I
	c.)	Portable fire extinguishers, fire control, spill control equipment and decontamination equipment. 40 CFR 265.32(c)	V	**************************************	endocumps of section	I ·
	d.)	Indicate the volume of water and/or foam available for fire control.	WOODs (Shinking spy) (1900)	(XIII)		· · · · · · · · · · · · · · · · · · ·
Comme	ents:		<b>*</b>			
	70					9+74-0- <u></u>
		*				
	<b>8</b> 4			·		
3.	Test: Equi;	ing and Maintenance of Emergency pment: 265.33	<del></del>			
	a.)	Has the owner or operator established testing and maintenance procedures for emergency equipment? 265.33	$\leq$		40 innovani	. The second of
	ზ.)	Is emergency equipment main- tained in operable condition? 265.33	$\checkmark$		€/ <u>1</u>	www.propherode.uke
	c.)	If required, has owner or operator provided immediate access to interal alarms? 40CFR 255.34(a)	r rnall	<b>65</b>		- NATE for an electrical and
	d.)	Is there adequate aisle space for obstructed movement for personnel and emergency equipment. 40 CFR 265.35.	un-			I

			INSP	ECTION	N FORM	D
Comm	ents	en de la companya de En la companya de la	Yes	) <u>No</u>	N/A	Violation Class
- Опд			·			
	<del> </del>					
				<u> </u>		
4.	- CO 1	the owner or operator attempted make arrangements with local corities in case of emergencies.			<u> </u>	
	40 (	FR 265.37	1/			1 -
Comm	ents:				100	<del></del>
				*** ***********************************	, <u>1991 - 1994 - 1995 - 19</u>	
			<del></del>			
<del></del>	<del></del>	CONTINCENCY DE LY	· · · · · · · · · · · · · · · · · · ·			
		CONTINGENCY PLAN AND EMERGENCY Rule 607, 40 CFR 265 Sub	Z PECC	EDURE	S	
4.	Does foll	the contingency plan contain the owing information:	ppart	D.		
	a.)	The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirement of this Part (As applicable). 265.52(a)	•			I
	b.)	Arrangements or attempts to make arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 40 CFR 265.52(c) 265.37	/			II
	c.)	Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. 40 CFR 265.52(d)		- Clarith-Land	NATIONAL PROPERTY AND ASSESSMENT OF THE PROPERTY AND ASSESSMENT OF THE PROPERTY AND ASSESSMENT OF THE PROPERTY OF THE PROPERTY ASSESSMENT OF THE PROPERTY OF THE PROPERTY ASSESSMENT OF THE PROPERTY ASSESSMENT OF THE PROPERTY OF THE	II

		<u> Y93</u>	Nс	<u>N/A</u>	Violation <u>Class</u>
d.)	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities. 40 CFR 265.52(e)	1/	approximate and the second	·	II
e.)	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.) 40 CFR 265.52(f)				II
f.)	Is the facility emergency coordinator identified. 40 CFR 265.55		49517		II
g.)	Is coordinator familiar with all aspects of site operation and emergency procedures. 40 CFR 265.55				II
h.)	Does the Emergency Coordinator have the authority to carry out the Contigency Plan. 40 CFR 265.55	<u>V</u>			II
i.)	If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56.	<u> </u>			I
j.)	Has contingency plan been amended to reflect changes in regulations, plan failure, changes in the facil- list of emergency coordinators, cha- in emergency equipment. 40 CFR 265.54	ity,	**************************************		II
Comments:				1714000	
			-Contract		

			. T. OLT.	L LJ
2. Are copies of the contingency plan available at site and local	<u>Yes</u>	<u>No</u>	N/A	Violation Class
emergency organizations. 40 CFR 265.53(a) 264.53(b)	$\checkmark$			II
				100000000000000000000000000000000000000
USE OF MANIFEST SYSTE Rule 601(2)(b)	M			and the second s
<ol> <li>Does this facility receive hazardous waste accompanied by a manifest. If yes, complete the following:</li> </ol>		X		
a.) Are copies signed and dated.				
Rule 608(1)(a)			•	I
<ul><li>b.) Are significant discrepancies noted on the manifest. Rule 608(1)(b)</li></ul>	·		***************************************	and the second s
c.) Are transporters given 1 copy of the signed manifst. Rule 608(1)(c)		***************************************		I
d.) Are copies sent to the generator within 30 days. Rule 608(1)(d)		•		I
e.) Are copies of the manifest retained for 3 years.			<u> </u>	<u> </u>
f.) Are copies of the manifest returned to DNR within 10 days after end of month. Rule 608		-	**************************************	II
omments:		<del></del>		The state of the s
	<del>-0 -0+ 0+ 0+ 0+ 0</del>	<del></del>		
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	-0'	·	<del></del>	

		4					
				INSPE	CTION	FORM	D
							Violation
				Yes	No	N/A	Class
2.	Does this facility waste off-site. If Generator Appendix. Rule 608(3)	yes, compl	ous ete	<u> </u>			N/A
Jomn	nents:						
					0) 14 D B		
12						7-1-1-2-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-	
3.	For unreconciled si crepancies in manimo Director been notification.	fests has th	ne			V	I
Comr	ments:						
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<del>-,,.</del>	1 4 1/28 - (18 4		<u> </u>		gespoon to		S
**************************************	Rule	RECORI 601(3) 40 CI	OKTEPING TR 265 Su	ıbpart.	E		
1.					-		
Τ.	Does the owner or facility maintain record? Rule 609(	an operating	tnis Z				II
Com	ments:	,					<del>(</del>
							11- VI
		50					-
<del></del>							
2.	Does this operating 265.73	g record co	ntain:				
	a.) The method(s) waste's treat disposal as r	ment, stora	ge, or 40 CFR	, /	_		II.
	Part 265.73(b	)(1) Append	ix E	$\underline{V}$		***************************************	

		Yes		Violation /A Class
b.)	The location and quantity of each hazardous waste within the facility? (This information shows be cross-referenced to specific manifest number, if waste was	uld	P#San	low waste ed in outdoor
	accompanied by a manifst:) 265.73(b)(2)		She	II —
c.	If this facility disposes of hazardous waste on-site, is there a map or diagram of disposal area. 265.73(b)(2)			II
d.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? 265.73(b)(3)	<b>Witnessess</b>	<b>C</b> ONTRACTOR NAME OF THE PARTY	II
e.	Reports detailing all incidents that required implementation of the Contingency Plan? 265.73(b)(4)	. ettiskillimmin		II
f.	Records and results of inspections as required in 40 CFR 264.15(d) 265.73(b)(5)			II
g.	) If required, monitoring, testing or analytical when required by construction permit or operating license. Rule 265.73(b)(6)		40	II
h.	Closure and post closure cost estimates. 265.73(b)(7)	1		II
Comment	s:			
		***************************************		
				492944
an	e all required records available d maintained for at least 3 years. 5.74(3)			II

Comi	ments	·:				<b>)</b>		Yes	No	<u>N/A</u>	Violation <u>Class</u>
***************************************					· · · · · · · · · · · · · · · · · · ·				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
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<del></del> ,								<u> </u>	<del></del>		
						BESOST	ING			40	
1.	a b:	inist	ar repo Cration	or oper ort to d n by Man s? 265	the re						II
Comm	nents	:	<del></del>						<del></del>		Martin and Property and Associated Spinish and Property and Associated Spinish and Associat
Miles Transcription				W., W., W.							
					·						
2.	rece	31Ve	hazaro	for TS ious was Rule 2	ta fr		_				I
	a.)	gen wit	erator	facility waste subject manife	from t to	an off-	-site				I
	b.)	scr dat	iption e rece	yes, purce of of the ived fo	tne quan	Waste a tity, t h upman	and a de	<b>}</b> -		***Community opening	I
				USE AND Drums/	MANA Roll-	GEMENT off Box	OF CONT	'AINERG	2		<del></del>
1.	Is h	azar: aine:	dous w rs? I	aste ac Î no, s	Cumu 1	a+ ad :_		_			N/A
2	a.)	haza	accu ardous	ontaine: mulation waste n w many	n date number	e and		c)/			I

		Yes	<u>No</u>	<u>N/A</u>	Violation Class
b.)	Has more than 90 days elapsed since date marked (Operaing license need as required in Part 5 of Rules)  If yes, how many drums  Accumulation dates	led			I
c.)	Is each container labeled or marked clearly with the words "Hazardous Waste" rule 306(c). If no, how many		`		I
d.)	Are containers in good condition Rule 306(1)(a), 40 CFR 265.171. If no, specifically what is their conditions.	<u>~</u>			I
e.)	Are containers compatible with waste in them. RULE 306(1)(a) 40 CFR 265.172.  If no, explain	V			I
f.)	Are containers stored closed, Rule 306(1)(a), 40 CFR 265.173(a) If no, how many			<i>802</i> — — — — — — — — — — — — — — — — — — —	I
g.)	Are containers managed to prevent leaks? Rule 306(1)(a), 40 CFR 265.173(b) If no, explain	<u> </u>	<i></i>		I
h.)	Are containers inspected weekly for leaks and defects? Rule 306(1 (a) 40 CFR 255.174.	) <u>/</u>			I
i.)	Are agnitable and reactive wastes stored at least 15 meters (50 Feet from property line? (Indicate if waste is ignitable or reactive) Rule 306(1)(a) 40 CFR 265.176. If no, explain	)			I
j.)	Are uncompatible wastes stored in separate containers (If not the provisions of 40 CFR 265.17(b) apply) Rule 306(1)(a) 40 CFR 265.176. If no, explain	·-	. **********		I

		•	Yes	<u>No</u>	N/A	Violation <u>Class</u>
	k.)	Are containers of uncompatible wast separated or protected from each other by physical barriers or sufficient distance? Rule 306(1)(a) 40 CFR 265.177.		-		I
Comm	ents:				<del></del>	
			-070			
3.	haza	storing free liquid, does ardous waste storage area include: e 306(1)(a) 40 CFR 264.175.	•			
	a.)	Impervious base free of cracks. 40 CFR 264.175(b)(1)	_		<del></del>	I
	b.)	Containment capable of holding 10% of volume of containers or 10% of largest container whichever is greater.	V	dike	<u> </u>	I
Comm	ents:	over 13 greater.				CHARLE MAN
4.	Is h the	azardous waste being accumulated at point of generation, Rule 306(2)	-	<u> </u>		N/A
		es: Is container less than 55 gallons or one quart of acutely hazardous waste? Rule 306(2)	<del></del>		of miles in a special state of the special state of	I
Ъ		Is container under control or operator and near point of generation and under control of operator? Rule 306(2)				I
C	. )	Are containers in good condition? Rule 306(2) 40 CFR 265.171		- Control of the Cont	4/8	I

			I!	4SPECT	ION FORM
	<b>,</b>	Yes	No	N/A	Violati Class
d.)	Are containers compatible with			——————————————————————————————————————	<u> </u>
	waste in them? Pule angle			٠	_
	40 CFR 265.172	<u> </u>			I
			-		
e.)	Are containers stored closed when				
	144 IN USE And managed to				₩-
	leaks? Rule 306(2 40 CFR 265.173				I
f.)	Are containers marked with the wor	.a			
	Haddrucus Waste and white	as			
	(or other words that identify the contents) Rule 306(2)				Ī
			·	******	
nents:					
····	-				
				·	
	TANKS	· · · · · · · · · · · · · · · · · · ·		_	
Is h	azardous waste accumulated in the	,		//	
Is h If n	TANKS azardous waste accumulated in tanks'	?		//	N/A
	azardous waste accumulated in tanks'	?	1	//	N/A
	azardous waste accumulated in tanks' o, skip to c.  Is each tank laboled as a company to the company tanks'	?	1		N/A
	azardous waste accumulated in tanks' o, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste	?	1		N/A I
a.)	azardous waste accumulated in tanks' o, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)	?	✓ _		
	azardous waste accumulated in tanks' o, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)  Are tanks used to store columbia.	?	_		
a.)	azardous waste accumulated in tanks' o, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)  Are tanks used to store only those wastes which will not cause are to the course of the course of the cause of the	?	_		
a.)	azardous waste accumulated in tanks' o, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)  Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a)	?	_		I
a.)	azardous waste accumulated in tanks' o, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)  Are tanks used to store only those wastes which will not cause are to the course of the course of the cause of the	?	_		
a.)	azardous waste accumulated in tanks' to, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)  Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).	?	_		I
a.)	azardous waste accumulated in tanks o, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)  Are tanks used to store only those wastes which will not cause corresion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).  Do uncovered tanks have at least	?	_		I
a.)	Azardous waste accumulated in tanks o, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)  Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).  Do uncovered tanks have at least 60 cm (2 feet) of freehourd		_	-	I
a.)	azardous waste accumulated in tanks' to, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)  Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).  Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structure.		_		I
a.) b.)	azardous waste accumulated in tanks' to, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)  Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).  Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structur Rule 306(1)(a), 40 CFR 265.192(c)?				I I
a.) b.) c.)	Azardous waste accumulated in tanks' to, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)  Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).  Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structur Rule 306(1)(a), 40 CFR 265.192(c)?				I I
a.) b.) c.)	Azardous waste accumulated in tanks' to, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)  Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).  Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structur Rule 306(1)(a), 40 CFR 265.192(c)?  Do continuous feed systems have a wastefeed cutoff? Rule 306(1)(a)				I I
a.) b.) c.)	Azardous waste accumulated in tanks to, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)  Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).  Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structur Rule 306(1)(a), 40 CFR 265.192(c)?  Do continuous feed systems have a wastefeed cutoff? Rule 306(1)(a), 40 CFR 265.192(d).				I I
a.) b.) c.)	azardous waste accumulated in tanks o, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)  Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).  Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structur Rule 306(1)(a), 40 CFR 265.192(c)?  Do continuous feed systems have a wastefeed cutoff? Rule 306(1)(a), 40 CFR 265.192(d).  Are required daily and weekly in				I I
a.) b.) c.)	Azardous waste accumulated in tanks' to, skip to c.  Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)  Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).  Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structur Rule 306(1)(a), 40 CFR 265.192(c)?  Do continuous feed systems have a wastefeed cutoff? Rule 306(1)(a)				I I

and the second s

		INSPECTION FORM		FORM	D Violation	
	•	Yes	No	N/A	Class	
f.)	Are reactive and ignitable wastes tanks protected or rendered non-active or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements. 261.21 or 261.23 Rule 306(1)(a), 40 CFR 265.199	in			II	
g.)	Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) Rule 306(1)(a), 40 CFR 265.199.			***************************************	I	
h.)	Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? Rule 306(1)(a) 40 CFR 198 (3)(b)	, and an analysis of the second secon			I	
	Tank capacity:	gall	ons			
	Tank diameter:	_ feet				
	Distance of tank from property li	ne			feet.	
	(See tables 2-1 through 206 of NE Combustible Liquids Code - 1977					
Comments:						
		<del> </del>	o	····	,	
tair mate wast	above ground tanks have a 150% con- nment area constructed of impervious erial, or if tanks hold incompatible tes is each tank structurally				I	

Com	ments	:	Yes	Мо	N/A	Violation Class
			A STATE OF THE STA	· · · · · · · · · · · · · · · · · · ·		
3.	Do (					
		owners and operators of underground ks do all the following:	1/			
	a.)	Provide secondary adequate containment and leachate collection system. Rule 615(4)(a)	X			I
	b.)	Conduct an inventory of the contents of the tanks at least twice a month. rule 615(4)(b)	#000A		- Control of the Cont	I
	c.)	Conduct leachate sampling at least once a year. Rule 615 (4)(c)			-0	I
	d.)	Maintain an accurate inventory of the tank. Rule 615(4)(d)	<del></del>			I
Comm	ents:					
				<del></del>		
4.	Is ha	azardous waste accumulated in				
	90110	r than tanks or containers?	V			N/A
-						
Comme	ents:					·
	<del></del>		·	<del></del>		
						1783

# CLOSURE AND POST CLOSURE (Part 255 Subpart G) Part 7 of Act 64 Rules

					•			
1.	Clos	sure 2	65.11	2	Yes	<u>No</u>	<u>N/A</u>	Violation Class
	a.)	Is t avai	he fa lable	cility closure plan for inspection?				I
	b.)			plan identify		<del></del>		•
		i.	max dur	imum extent unclosed ing facility life?	V			I
		ii.		imum hazardous waste entory?		<del>The state of the </del>	<del></del>	I
		iii.	est	imated year of closure	UNK		,	I
		iv.	sch	edule of closure activi	ties			Ī
nm	ents:		**************************************					**************************************
							······································	
2.	Post	-Closu	re 26	35.118 - Act 64 Rules	1	/		
	a.)	Is th	e pos	st-closure plan for inspection?	X	\		I
	b.)	•		plan contain:				-
		i.	mour	ription of groundwater toring activities and uencies?	,			I
		ii.	desc acti for	ription of maintenance vities and frequencies		<del></del>	-	
			AA.	integrity of cap. fina cover, or containment structures, where applicable.	al 			I
			BB.	facility monitoring equipment.				I
							·	

		<u>Yes</u>	<u>No</u>	N/A	Violation <u>Class</u>
i	ii. name, address, and pho- number of person or of to contact during post closure care period?	fice	- Control of the Cont	****	I
c.)	Has the post-closure perio begun?	d			N/A
d.)	Is the written post-closur cost estimate available? 265.144	e	-		I
Comments:					
		9,040			<u> </u>
			70×700	,	
					0.000

^{*} Applies only to disposal facilities.

Yes No N/A Class

#### GENERATOR APPENDIX

Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

trea	atment	storage, or disposal.	LIY SNIPPe	ed off-site for
	<u>Mani</u>	fest Requirements		
1.	a.)	Does the generator have copies of the manifest available for review and on-site. 262.40	<u></u>	II
	b.)	Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.		
Comn	ents:			
	•			
····			***************************************	
2.	the copi mani	he manifest forms examined contain following information (If so, make es of, or record information from fests that do not contain the ical elements:		
	a.)	Manifest document number (Rule 304(2)(a)?		II
	b.)	The generator's name, mailing address, telephone number, and EPA Identification number. Rule 204(2)(b)	<u></u>	II
<u>;</u>	c.)	The name and EPA ID number of transporter. Rule 304(2)(c)	<u> </u>	II
	d.)	Name, address, and EPA ID number of designated permitted facility and alternate facility. Rule 304(2)(d)		Chem-met mich. Oispire/ Petro-chem. E 1560, Arch. II
	e.)	The description of waste(s)(DOT shipping name, DOT hazard class, DOT identification number. Rule 304(2)(e)		II

			GENER	ATOR	APPENI	
			Yes	No	<u>N/A</u>	Violation <u>Class</u>
	f.)	The total quantity of waste(s) and the type and number of containers loaded. Rule, 304(1)(f)	V.			II
	g.)	Hazardous waste number describing the wastes. Rule 304(1)(g)				II
	h.)	Certification as required in Rule 304(1)(h)		***********		II
	i.)	Signatures as required in Rule 304(4)			this three warms	I
	j.)	Waste minimization program/ certification	<i>V</i>	<del></del>		I
Comm	ents:	•				
	7			<del></del>	# #***************************	
			· · · · · · · · · · · · · · · · · · ·		1.5	
		<b>4</b> .				
3.	Repo	rtable exceptions. Rule 308(3), 40	CFR 2	62.42		199. laka 1884 da 1999 ay 1993
	a.)	For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.			)	
	b.)	For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.				
Comm	ents:			<del>700</del>		
COnni	enca.			**************************************		
						· · · · · · · · · · · · · · · · · · ·

ARTA 183 RCRA Inspection Report

EPA Identification Number:	257676124	
Installation Name: PARKER SURFICE TA		
Location Address: 32100 STEPHE	FUSON HUY. CHEMICAL	1 CO
City: MADISON HEIGHTS State:	MICHIGAN.	
Date of inspection: 06-14-83 Time of	f inspection (from) $1:00$ (to) $3$	:30
Person(s) interviewed Title	Tel ephone	
	MANAGER (313) 583-93	300
		-
Inspector(s)	/Title	*
Inspector(s)  LAURA LODISIO MON	/Title Telephone  IR - PESOURCE (313)368-33  SPECIALIST	35
	IR - RESOURCE (313)368-33	35
	IR - RESOURCE (313)368-33	35
LAURA LODISIO MON	Inspection Form(s)	35
Installation Activity (mark only one box)	Inspection Form(s)  5.1 and/or	35
Installation Activity (mark only one box)  Treatment/Storage/Disposal per 40 CFR 269 Generation and/or Transportation	Inspection Form(s)  5.1 and/or	35
Installation Activity (mark only one box)  Treatment/Storage/Disposal per 40 CFR 26: Generation and/or Transportation  Treatment/Storage/Disposal (no generation)	Inspection Form(s)  5.1 and/or  A  A	35

#### Section A: SCOPE OF INSPECTION.

- 1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- 2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit appli	icatio	n process(es) (EPA Form 3510-3)	Inspection Form	A section(s)
\$01	X	storage in containers		I
\$02	X	storage in tanks		J
TOI	X	treatment in tanks		J
\$04	II.	storage in surface impoundment		K,F
T02	II	treatment in surface impoundment		K,F
D83		disposal in surface impoundment		K,F
\$03	II	storage in waste pile		L
D81	II	disposal by land application		M,F
D80	Ì	disposal in landfill		N,F
Т03		treatment by incineration		0/P
ТО4		treatment in devices other than impoundments, or incinerators	tanks, surface	Q
ther activities	<u> </u>		•	
GENERATOR			APPENDIX (	GN
TRANSPORTER	(∏		APPENDIX	TR

 Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

502, TOI - No storage or treatment in

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart R)

			YES	NO	NI*	Remarks
٦.		the Regional Administrator notified regarding: 265.12				e e e e e e e e e e e e e e e e e e e
	a.	Receipt of hazardous waste from a foreign source?	ternesseredelend	NeW Michigan Colonia	sh-brimmenth-less-sas-	NA
	b.	Facility expansion?	***************************************	## Market representation	almost, market margange	N.A.
	C.	Change of owner or operator?				Letter to U.S. EPA
2.	Gen	eral Waste Analysis: 265.13				dated 07-02-82.
	ā.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?			ggunnssimels	Analysis of sludge 2-3 times yyear. Analysis of lab
	b.	Does the owner or operator have a detailed waste analysis plan on file at the facility?				puck on individual basis.
	C.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	METATOR STATE OF THE STATE OF T	·		No off-site waste
3.	Sec	curity - Do security measures include (if applicable) 265.14	•		₩.	
	a.	24-Hour surveillance?	Andrés de l'Antres	-1	***************************************	
	b.	i. Artificial or natural barrier around facility?		a land		
		and ii. Controlled entry?			TOTAL COMMENTS	locked shed.
	C.	Danger sign(s) at entrance?		and particular from	with the state of	Put up additional
4.	0wr	ner or operator inspections: 265.15				sign as require
	a.	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	1		Militarentematema	

-		YES NO NI Remarks
	b. Does the owner or operator have an inspection schedule at the facility?	
	c. If so, does the schedule address the inspection of the following items:	
	i. monitoring equipment?	<u>NA</u>
	ii. safety and emergency equipment?	
	iii. security devices?	
	<pre>iv. operating and structural equip- ment (i.e. dikes, pumps, etc.)?</pre>	/ condustre ve maint. defet
	v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	
	vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	V weekly/bi-week
	d. Are areas subject to spills inspect- ed daily when in use?	1 shed
	e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	
	f. Does the inspection log contain the following information:	pot time, but
•	i. the date and time of the inspection?	1 _ not recessor
	ii. the name of the inspector?	
	<pre>iii. a notation of the observations   made?</pre>	
	iv. the date and nature of any repairs or remedial actions?	
	personnel training records lude: 265.16	
	a. Job titles?	

Job descriptions?

			YES NO	ΝI	Remarks lists subjects discuss
	C.	Description of training?		en e	- no thourough descript
	d•	Records of training?			
	e.	Did facility personnel receive the required training by 5-19-81?		NP-Mon-Viewwich	
	f.	Do new personnel receive required training within six months?	ne-bi-bi-bi-bi-bi-bi-bi-bi-bi-bi-bi-bi-bi-		N.A No new personnel.
	9.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?		·	Our for one in spely. It is
6.	req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.	17		planned to take
	a.	Special handling?		44mmmassas	Afthere is flammas
	b.	No smoking signs?		Salaquistiquistanip	whate.
	C.	Separation and protection from ignition sources?			
			•		

Mr. Beyor has attended corporate level chagardous waste seminers and DOT sponsored training programs. He conducts in house training for all other employees. They also will be using on Audio-B-3 Visinal Presentation used at their Morence, Mich. Facility.

Is there any evide explosion, or rele hazardous waste or waste constituent?  2. If required, does the have the following equal a. Internal communical alarm systems?  b. Telephone or 2-way at the scene of or control, spingled equipment and dece equipment?  Indicate the volume or control and control and control and decent and dece	ase of hazardous facility uipment: 265.3 ations or y radios perations? inguishers, ll control contamination		- pour - spec	ums & communication  a in the plant  of not in storage  sect. As yet co. fell  re has been no  sect, howevery continue  el control equipal  best pellows  rell teman
have the following eq  a. Internal communic alarm systems?  b. Telephone or 2-wa at the scene of o  c. Portable fire ext fire control, spi equipment and dec equipment?	ations or yradios operations? inguishers, ll control contamination		- Jon - Sou	e in the plant of not in storage sed. As yet co. fell we has been no eed, howevery continue eed, howevery continue the fire extingen- il control equip
alarm systems?  b. Telephone or 2-wa at the scene of of the scene of of the scene of of the scene of of the scene of the s	y radios operations? inguishers, ll control contamination	foam availab		ed As yet co. fell ne has been no contingent contingent contingent bent eguipe bent pellows
at the scene of o  c. Portable fire ext fire control, spi equipment and dec equipment?	operations? inguishers, il control contamination	foam availab		eed howevery continued to be fire extingential control equipalent pellows
fire control, spi equipment and dec equipment?	ll control contamination	foam availab		best sellows
Indicate the volume o	of water and/or	foam availab	Je for fine &	ell Temer
			ne for tire co	Contamus
	- ay	hire s	hudra	A5.
3. Testing and Maintenan Emergency Equipment:	nce of 265.33			
a. Has the owner or established testi maintenance proce for emergency equ	ing and edures		-es -cli nin	tinguishers contraction of the sogning. pected by maint
b. Is emergency equimaintained in ope condition?			demonst entirejonas assumats	dyst
4. Has owner or operator immediate access to alarms? (if needed)	internal		Markalis posteralapado apostosam	
5. Is there adequate ais for unobstructed move				
6. Has the owner or oper to make arrangements authorities in case of at the facility?	with local			itten documentos. Lu have con ies
he ofg. sheel is signicolated from the mod appears then for some sort of	ran plant Lis a 1	C-1	6 main es	rocclused.

YES NO NI Remarks

٦.	Does :	the	Contingency	Plan	contain	the
	follo	wina	information	า:	265.52	

- a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
- b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
- c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- 2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

Ohain of Command hus been designate as required per

Fire documentes
Police July 12,193
Hospitals

/____documented

- 3. Emergency Coordinator 265.55
  - a. Is the facility Emergency Coordinator identified?
  - b. Is coordinator familiar with all aspects of site operation and emergency procedures?
  - c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?
- 4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

R. Market Bark		
	<b>€</b>	
	Schwerzück*—UP	
	 econtribition/file	

No emergency has occurred as of yet.

Section E: MANIFE			(Part	265	Subpart	E)

	•	Section E: MANIFEST SYSTEM,	KECUKUI	LEEPING,	AND KE	OKIING: (Par	rt 265 Subpart E)
			YI	S NO	NI	Remarks	
1.	Use of	Manifest System 265.71					
	pro pro (Pa the gen	s the facility follow the cedures listed in §265.71 for cessing each manifest? rticularly sending a copy of signed manifest back to the erator within 30 days after ivery.)					
		records of past shipments ained for 3 years?					
2.	require	e owner or operator meet ments regarding manifest ancies? 265.72	·	orebrain felitadoustrali			
of	on-site	ble to owners or operators facilities that do not waste from off-site sources.					
3.	Operati	ng Record 265.73			•		
	mai rec	s the owner or operator ntain an operating ord as required in .73?					
	con	es the operating record stain the following formation:					
	i.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?				Since J	gusti insuece
	ii.	The location and quantity of each hazardous waste within facility? (This information should be cross-referenced to specific manifest number if waste was accompanied by by a manifest.)	the n	<u>/_</u>	<b>N</b> ASSONING TO THE STATE OF THE		ast inspect as begun t in plant utory.
	***111.	A map or diagram of each cell or disposal area		TE://	Menic	al Was	to Mat.
		applies to disposal	,	E-1	15 Ohio	designo D. facility	to Mat. ted 4/82-A is franspor e is TSD

^{***} only applies to disposal facilities

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

- iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?
  - v. Reports detailing all incidents that required implementation of the Contingency Plan?
- vi. All closure and post closure costs as applicable?
- 4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

- ".**Unmanifested Waste Reports 265.76
  - a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?
  - b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

Visposal Facility does

Unade analysiss of

Isb wastes.

So does anolysis

of Hag. sludge

Updated 5-19-83-to

include inflation

N.H. - No off-site waste acopted.

^{**} Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

#### Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

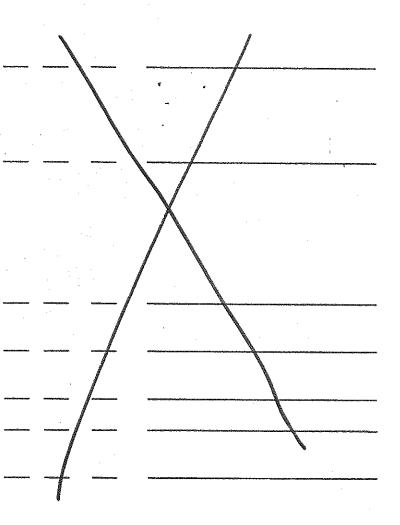
YES NO NI Remarks

#### 1. Closure 265.112

- a. Is the facility closure plan available for inspection?

195 ohum - Max

- b. Does the plan identify:
  - i. maximum extent unclosed during facility life?
  - ii. maximum hazardous waste inventory?
  - iv. estimated year of closure?
  - v. schedule of closure activities?
- c. Has closure begun?
- *2. Post-Closure 265.118
  - a. Is the post-closure plan available for inspection?
  - b. Does this plan contain:
    - i. description of groundwater monitoring activities and frequencies?
    - ii. description of maintenance activities and frequencies for
      - AA. integrity of cap, final cover, or containment structures, where applicable
      - BB. facility monitoring equipment
    - iii. name, address, and phone number of person or office to contact during post-closure care period?
  - c. Has the post-closure period begun?
  - d. Is the written post-closure cost estimate available? 265.144



Applies only to disposal facilities.

# Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		YES NO	NI	Remarks
	Are containers in good condition? 265.171		шихниченци	
2,	Are containers compatible with waste in them? 265.172	1		
3.	Are containers managed to prevent leaks? 265.173		decade and configurations	
4.	Are containers stored closed?		torrow and any	
5.	Are containers inspected weekly for leaks and defects.	1_	<del></del>	
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.176	Фебенацичар	Sheol
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	_/_	NAMES AND	·
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	/_		Sab packs out

Sect'	ion	A:	Scope

tor.

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

			YES	NO	NI	Remarks
(1)		s the operator have copies of the manifest ilable for review? 262.40			· · · · · · · · · · · · · · · · · · ·	**************************************
(2)		mine manifests for shipments in past 6 ths. Indicate approximate number of airested shipments during that period.	<u> pa</u>	st	yeav	12-28-82 5-5-43
(3)	Do fol cop	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manities) that do not contain the critical ments). 262.21				
	a.	Manifest document number?	1		477450 karisin missanish	
	b.	Name, mailing address, telephone number, and EPA ID number of Generator			profilector/remaining real of the control of the co	
	c.	Name and EPA ID Number of Transporter(s)?			Openitudes services	
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	_ <u></u>		***************************************	After the section of the commission of the commi
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?				
. '	f.	The total quantity of waste(s) and the type and number of containers loaded?	<u> </u>		: NATURE NATURAL TO SERVICE NATURA TO	
	g.	Required certification?		-		-
	h.	Required signatures?				
(4)	Rep	ortable exceptions 262.42				
	a.	For manifests examined in (2) (except for senter the number of manifests for which the signed copy from the designated facility wi	gene	erato:	r has	NOT received a

4/82-A

ment. Last shipment has been - 40 days. Will

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administra-

Sec	tion	C: PRE-TRANSPORT REQUIREMENTS (Part 262,	Subpart C)			
1 0	with (Red	waste packaged in accordance h DOT regulations? quired prior to movement of ardous waste off-site) 262.30	YES NO	NI	Remarks	no-managamananananan
2.	in con (Red	waste packages marked and labeled accordance with DOT regulations cerning hazardous waste materials? quired for movement of hazardous te off-site) 262.31 262.32		<b>Particularity</b>		haven have been been been been been been been be
3.		required, are placards available to nsporters of hazardous waste? 262.33		house many		
4.	was wit and to	site accumulation of generated hazardous wa te it generates either (A) in its storage of h 40 CFR 262.34 [see 265.1(c)(7)]. Option containers. If the installation elects option Section D. If the installation elects options: See 40 CFR 262.34 January 11, 1982 Re	facility [265. B restricts a otion A, check ion B, complet	l(b)] ll acc this	or (B) in accordanc umulation to tanks box     and skip	e .
	a.	Is each container clearly marked with the start of accumulation date?	dereferantings summarrays.	hadellarithadella .	N.A.	tron was make a some or of the comp
	b.	Have more than 90 days elapsed since the date inspected in (a)?	1949-6475/ride vaccinvisionals	managa mapaka	Storage	Fuci
	С.	Do wastes remain in accumulation tanks for more than 90 days?	104000aaba			
,	d.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?				ale ann bhlian shìonnach a ann àireach trai
Sec	tion	D: - RECORDKEEPING AND REPORTING (Part 262	2, Subpart D)			
1.	nee min	all test results and analyses ded for hazardous waste deter- ations retained for at least ee years? 262.40	YES NO	NI ———	Remarks	hamman sannak rhá SE (m ² ² ² ² ² ²
Sec	tion	E: - INTERNATIONAL SHIPMENTS (Part 262, S	ubpart E)	ı		
].		the installation imported or orted Hazardous Waste? 262.50	1			<u> </u>
		answered Yes, complete the following applicable.)	•			
	a.	Exporting Hazardous waste, has a generator:	•			•

5HH-TUB

SEP 1 7 1982

Mr. Ken Walker 824 North Street Morenci, Michigan 49256

MID057676124

Dear Mr. Walker:

As we discussed in telephone conversations on September 16, 1982, I am sending you a copy of the Compliance Order this agency issued to Occidental Chemical Corp., Parker Surface Treatment Products Division. The Order cites violations of hazardous waste management regulations under the Resource Conservation and Recovery Act.

Thank you for your concern in this matter. If you have any questions or wish to discuss the Order further, please contact me at (312) 886-7482.

Sincerely,

Sally K. Swanson Environmental Protection Specialist

Enclosure

cc: Alan J. Howard, Chief Office of Hazardous Waste Management Michigan Department of Natural Resources

bcc: Gade, ORC

S. Swanson: rita: 5HW-TUB: 6-7444:9-17-82

SEP 17 1982

Mr. Ken Malker 824 North Street Merenci, Michigan 49286

Seat Mr. Walkers

As we discussed in telephone conversations on September 16, 1982, I am sending you a copy of the Compliance Order this agency issued to Occidental Chemical Carp., Parker Surface Treatment Products Division. The Order cites violations of hazardous easte management regulations under the Resource Conservation and Recovery Act.

Thank you for your concern in this matter. If you have any questions or wish to discuss the Order further, please contact ea et (312) 886-7482.

Sincarely,

Sally K. Swanson Environmental Protection Spackalist

Pact oction

cot Alan J. Howard, Chief
Office of Hazardous Waste Homegeront
Michigan Papartment of Matural Resources

Dec: Oade, ORC

PARKER DIVI

100KER CHEMICALS & PLASTICS CORP. • 32100 Stephenson Highway, Madison Heights, MI 48071 • Tel. (313) 583-9300

July 12, 1982 EIVED

Mr. Larry AuBuchon
Department of Natural Resources
Resource Recovery Division
Southeast Michigan Region
State Fairgrounds
1120 W. State Fair Ave.
Detroit, MI 48203

JUL 14 1982
RESOURCE RECOVERS EIVED
S.E. MICHIGAN REGION
S.E. MICHIGAN PROJUL 16 1982
DIVISION OFFICE JUL 16 1982

Dear Mr. AuBuchon:

The items referred to in your RCRA Inspection Report, which was based on your RCAA inspection of our facility on June 15, 1982, have all been acted upon, or corrected.

The corrections are as follows:

- 1. Name change A form letter indicating our facility name change has been sent to the U.S. EPA, Region V, Chicago, IL.
- 2. Section B, Question 3.c The additional signs for the shed have been ordered and will be posted as soon as they are received.
- 3. Section B, Question 4.d We will comply by conducting weekly inspections of all waste storage areas.
- 4. Section B, Question 4.f The enspection log now contains notations on observations made concerning stored waste and the appropriate actions taken.
- 5. Section B, Question 5.g The personnel involved with waste management and handling will be given an annual review of the program and will sign-off in the RCRA manual by July 30, 1982.
- 6. Section D, Question 1.a The Contingency Plan chain-of-command has been clarified so that it includes the SPCC Coordinator.
- 7. Section D, Question 1.b Local Fire and Police Departments have been notified by sending them copies of our Contingency Plan which includes: Coordinators, evacuation plan, coordinators responsibilities, emergency equipment, spill control equipment and communications available and its location in the facility.
- 8. Section D, Question 1.d A list of all emergency equipment available and its location is included in the Contingency Plan.
- 9. Section D, Question 2. Same as item 7 above.

(continued)

PMRKER

page 2

- 10. Section E, Question 3.b.ü. A list indicating the location and quantity of all hazardous waste drums is now available in the RCRA manual.
- 11. Section G, Question 1.b.u. The maximum hazardous waste inventory is listed in the RCRA manual as 195 Drums.
- 12. Section G, Question 1.b.iv. The sequence of closure activities is now outlined in the RCRA manual.

If further clarification is necessary, please contact me.

Very truly yours,

OCCIDENTAL CHEMICAL CORPORATION PARKER Surface Treatment Products

George J. Beyer

Technical Support Manager

GJB/mz

NATURAL RESOURCES COMMISSION

JACOB A. HOEFFR
CARL T. JOHNSON
F. M. LAITALA
TRY P. SNELL
HARRY M. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

#### DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

June 17, 1982

RESOURCE RECOVERY COMMISSION

THOMAS J BLESSING, JR.
ALBERT M BORKIN
ANN-ESKIRDGE
PAMELA A FRUCCI
C EMIEST KEMP
JOHN W. ŁAYMAN
CLIFFORD MILES
STUART B. PADNOS
ROGER RASMUSSEN
JAMES STORNANT
MICHAEL L. WALKINGTON

RESOURCE RECOVERY DIVISION

SE MICHIGAN REGION STATE FAIRGNOUNDS 1120 W. STATE FAIR AVE. DETROIT, MI 48203

313/368-3335

George Beyer, Technical Support Mgr. Occidental Chemical Corp.
Parker Surface Treatment Products
32100 Stephenson Hwy.
Royal Oak, MI 48071

EPA ID # MID057676124

Dear Mr. Beyer:

On June 15, 1982, I conducted an investigation of your facility at 32100 Stephenson Hwy., Madison Heights, MI to evaluate compliance of the facility with requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

Enclosed is a copy of the inspection report. I feel that your facility is substantially in compliance with the requirements, however, there are a few minor points which still need to be addressed and/or clarified. Please refer to the inspection report and the remarks section and, as appropriate, address the alterations.

You are requested to respond to this letter by July 16, 1982 providing information regarding those actions to correct these identified points. Please address your response to the address in the upper right corner of this letter.

If you have any questions regarding this matter, please feel free to contact me at (313) 368-3335.

Sincerely,
RESOURCE RECOVERY DIVISION

Much peral

Larry AuBuchon

SOUTHEAST MICHIGAN REGION

LA:pf

cc: Al Howard, OHWM

EPA

JUN 21 1982 ACT GA



# RCRA Inspection Report

A Identification Number: M T D	05767	
Installation Name: Parker Div C	Ly Motal Industria	eccop.
Location Address: 32100 34 pt	rence Highway	
City: Wake a Health	State: MI	
Date of inspection:	Time of inspection (from)	5930 (to) 1100
Person(s) interviewed	Title	Tel ephone
Goords Bokel.	Tech Support Mar.	(313) 583-9300
Inspector(s)	Agency/Title   MDNR-RRD   Water-Quality Speci	Tel ephone (313) 368-3335
ınstallation Activity (mark only one	e box)	Inspection Form(s)
Treatment/Storage/Disposal per 40 Generation and/or Transportation	CFR 265.1 and/or	A
	eneration or Transportation	) A
☐ Generation and Transportation		B, C
☐ Generation only	RECEIVE	B
	JUN 21 1982	C
	ACT 64	
New name: Occidental	an sail jutilized	me change.
New name: Occidental Parker	Demica Cerpor Surface Treatme	ate Froducts

#### Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit appir	Cation	1 blocess(62) (CAN LOLD 2010-2) Tueb	ection form	A section(s)
501	И	storage in containers		1
\$02	$\prod$	storage in tanks		J
T01	$\prod$	treatment in tanks		J
\$04		storage in surface impoundment		K,F
T02		treatment in surface impoundment		K,F
D83	П	disposal in surface impoundment		K,F
\$03	П	storage in waste pile		L
D81		disposal by land application	•	M,F
D80	$\dot{\square}$	disposal in landfill		N,F
. T03		treatment by incineration		0/P
Т04	П	treatment in devices other than tanks impoundments, or incinerators	, surface	Q
Other activities	<u>.</u>			
GENERATOR	N		APPENDIX	GN
TRANSPORTER			APPENDIX	TR
			• .	•

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

None

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

None

			YES	ИО	NI*	Remarks
١.		s the Regional Administrator en notified regarding:				
	ā.	Receipt of hazardous waste from a foreign source?		<del></del>		MIN
	b.	Facility expansion?			******	()/()
	C٠	Change of owner or operator?	<del></del>		<del></del>	NA
2.	Ger	neral Waste Analysis:	-			,
	a.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?				
	ь.	Does the owner or operator have a detailed waste analysis plan on file at the facility?	_X			
:	C.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	• .			1.) [2
3.	Sec	curity - Do security measures includ (if applicable)	e:			
-	a.	24-Hour surveillance?		· ——	<del></del>	n/b
	b.	or  i. Artificial or natural barrier around facility? and ii. Controlled entry?		•	R	A/u
		·		<del></del>		
	c.	Danger sign(s) at entrance?	<u>X</u>			Place ablition Sugar
4.	0wr	ner or operator inspections:				at End entrance with
	a.	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	X		haberee state Workship	(Storage and )
		,				

*Not Inspected

•			163	NU	14.7	Remark S
	hav	es the owner or operator e an inspection schedule the facility?	X	-		
•	the	so, dues the schedule address e inspection of the following ems:				· •
	i.	monitoring equipment?				1) [2
	ii.	safety and emergency equipment?				<u> </u>
	iii.	security devices?		·		
	iv.	operating and structural equip- ment (i.e. dikes, pumps, etc.)?		<u> </u>		R A
٠,	٧.	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<u>X</u>			
	vi.	inspection frequency (based upon the possible deterioration rate of the equipment)?	X		· ·	ورود والمراس
	d. Are	areas subject to spills inspect- daily when in use?	<u> </u>	••	<del></del>	shell our only de
	an	s the owner or operator maintain inspection log or summary of er or operator inspections?	<u> </u>		· • • • • • • • • • • • • • • • • • • •	weekly.
		s the inspection log contain the lowing information:			:	
	i.	the date and time of the inspection?	X	*******	-	
	ii.	the name of the inspector?	X			
	iii.	a notation of the observations made?	X			toward starily
	iv.	the date and nature of any repairs or remedial actions?	π <u>X</u>	alvalation blog sub-		
Do pe inclu		training records				
,	a. Job	titles?	$\overline{\chi}$			
	p. jop	descriptions?	X	-	<del>=/</del>	

			YES	NO .	NI	Remarks
	С.	Description of training?	<u>X</u>		<del></del>	
	d.	Records of training?	X			
	e.	Did facility personnel receive the required training by 5-19-81?	<u>X</u>	http://www.ma	***************************************	
	f.	Do new personnel receive required training within six months?	X			
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?		X	·	June James James Van agrifformer all somme
6.	requ	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed?				and the second
	a.	Special handling?	X	<del> </del>	<del></del>	
	b.	No smoking signs?	X		the of the land	Indus and " atomosaka such
	C.	Separation and protection from ignition sources?	<u>X</u> .	*****		signs and possed.

## Section C: . EPAREDNESS AND PREVENTION: (F. t 265 Subpart C) 1. Maintenance and Operation of Facility: -YES NO NI Remarks Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? If required, does the facility have the following equipment: Internal communications or alarm systems? Telephone or 2-way radios at the scene of operations? c. Portable fire extinguishers. fire control, spill control equipment and decontamination equipment? Indicate the volume of water and/or foam available for fire control: Testing and Maintenance of Emergency Equipment: Has the owner or operator established testing and maintenance procedures for emergency equipment? Is emergency equipment maintained in operable condition? Has owner or operator provided immediate access to internal alarms? (if needed) Is there adequate aisle space

for unobstructed movement?

at the facility?

6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency

	-	Section D: CON GENCY PLAN AND	EMERG	ENCY	PROC.	RES: (Part 265 Subpart D)
			YES	NO	NI	Remarks
•		s the Contingency Plan contain the lowing information:				
	a.	The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are		-		
		sufficient to comply with the requirements of this Part (as applicable.)	X			Caify Sain of comme
	· b.	Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	<del>\</del>		Summinarity of s	"Plan is not on fill at the
	С.	Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	<u>X</u>	-	**************************************	Plan is not on lile at the a nall of the agencies according to the accordi
	d.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?			<u>X</u>	Adoles is the swant
	e.	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	<u>X</u>		жаруучиг	
2.	ava	copies of the Contingency Plan ilable at the site and local rgency organizations?	<u>X</u> .	<del></del>		Plan was jud dellefeel of the language of standard line standard sta
-			)~]			organisations 4/82-A
			٠	, ** # J		

		1F2	NU	14.1	kemarks
Eme	rgency Coordinator				
a.	Is the facility Emergency Coordinator identified?	X		·	
b.	Is coordinator familiar with all aspects of site operation and emergency procedures?	$\overline{\chi}$		quaggy, quan	
C.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X		***************************************	
Eme	rgency Procedures		-	•	
at Coc	an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency occurred in 265.56?	anno di militari di mangani di ma		<b>O</b> rrivonanty <b>ib</b> r	No example occur

4.

		YES	NO .	NI	Remarks	
Use of 1	Manifest System					
proc proc (Par the gene	s the facility follow the cedures listed in §265.71 for cessing each manifest? rticularly sending a copy of signed manifest back to the erator within 30 days after ivery.)		· .	Promote and the second	NA.	
	records of past shipments ained for 3 years?				A M	
	e owner or operator meet ments regarding manifest ancies?		: '		N/A	
on-site	ble to owners or operators facilities that do not waste from off-site sources.		:		1	
Operati	ng Record					
mai rec	s the owner or operator ntain an operating ord as required in .73?	X		-	·	
con	s the operating record tain the following ormation:					
<b>i.</b>	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	X	<u> </u>			
ji.	The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)	1	<u> </u>	Nacional Committee	* stricture	location a quan
***iii.	A map or diagram of each cell or disposal area			•	of have the fac prior	indone waste with a placement?

		JF2	NO	N1	Remarks	
	showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)				NA	
i	v. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?					
	v. Reports detailing all incidents that required implementation of the Contingency Plan?		***************************************		NA	
٧	i. All closure and post closure costs as applicable?	X				 •
Avai	lability of Records			-		
unde	all facility records required r 40 CFR Part 265 available for ection?	X	***************************************	<del>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</del>		 
*Unma	nifested Waste Reports	-				
	Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?	·	do-Philippelis		NA	
-	If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.				770	

5.*

^{**} Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

			•		YES	NO	ΝI	Remarks		
1.	Clos	sure		· •				,		
•	a.		he facility closure a available for inspe	ction?	X					-
	b.	Does	the plan identify:							
		i.	maximum extent uncloing facility life?	sed dur-	<del></del>		<u> </u>	NA		
		ii.	maximum hazardous wa ventory?	ste in-	<del></del>	1.		Victorian man	h motale	العالم الرار
		ίΫ¦	estimated year of cl	osure?			· ·	1.13		
		۱۷.	schedule of closure	activities?		<u> </u>		200	13 3 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	as of dree
2.	c. 人。 Pos		closure begun? سلامہ فلعصد معنع نم osure	linate vailable	X	7	<u> </u>	13 f		· · · · · · · · · · · · · · · · · · ·
	ā.		he post-closure plan inspection?	available		•		NE	ì	
	b.	Does	this plan contain:					<b>!</b> .		
	• .	i.	description of groun monitoring activitie frequencies?				<del></del>			
		ii.	description of maint activities and frequ			÷ ,				
			AA. integrity of ca cover, or conta structures, whe cable	inment	<b></b>					
			BB. facility monito	ring equip-						
	i·		ment name, address, and p of person or office during post-closure	to contact						•
	Ç.	Has	the post-closure per	iod begun?	<del></del>	واستنبانيا				
	d٠		he written post-clos mate available?	ure cost	<del></del>	,	********			
Ann	lies	only	to disposal facilit	ies.	G۰۰	1		•		4/82-A

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

			•	A Comment of the Comm
		YES NO	ΝI	Remarks
١.	Are containers in good condition?	<u>X</u>		
2.	Are containers compatible with waste in them?	<u> </u>		
3.	Are containers managed to prevent leaks?	<u>X</u>		
4.	Are containers stored closed?	<u>X</u>		
5.	Are containers inspected weekly for leaks and defects.	X		
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if	<b>.</b> ✓		
	waste is ignitable or reactive).		<del></del>	
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply).	<u>X</u>		
8	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<u> </u>		

Section I - USE AND MANGEMENT OF CONTAINERS (Pa 265, Subpart I)

Sect	ion /	A: Scope				·
-	haza	lete this Appendix if the owner or operator rdous waste that is subsequently shipped off isposal.				
Sect	ion i	B: MANIFEST REQUIREMENTS (Part 262, Subpart	в)	•	<b>*</b>	
			YES	NO	NI	Remarks
(1)		s the operator have copies of the manifest ilable for review?	X			
(2)	mon	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.			٠.	
(3)	fol cop fes	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manitis) that do not contain the critical ments).				
1 ,	a.	Manifest document number?	X		<del>for a serior a</del>	
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	X	Section Street	<del></del>	
	c.	Name and EPA ID Number of Transporter(s)?	X		<del></del>	
	d•	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u>X</u>			
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>			
			•			

f. The total quantity of waste(s) and the type and number of containers loaded?

g. Required certification?

h. Required signatures?

#### (4) Reportable exceptions

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.

1.	wit	waste packaged in accordance h DOT regulations?	YES	ИО	NI	Remarks
		quired prior to movement of ardous waste off-site)	X		*****	
2.	in con	waste packages marked and labeled accordance with DOT regulations cerning hazardous waste materials? quired for movement of hazardous				-
		te off-site)	7			Denne to an in
3.		required, are placards available to nsporters of hazardous waste?	工			
4.	was wit and	site accumulation of generated hazardous waste te it generates either (A) in its storage fac h 40 CFR 262.34 [see 265.1(c)(7)]. Option B containers. If the installation elects option Section D. If the installation elects option ons:	ility restri on A,	[265] cts a check	.1(b)] all ac < this	or (B) in accordance cumulation to tanks box  and skip
	ā.	Is each container clearly marked with the start of accumulation date?	E-territorer annie			
	<b>b.</b>	Have more than 90 days elapsed since the date inspected in (a)?	<del></del>			
	С.	Do wastes remain in accumulation tanks for more than 90 days?			· 	
•	ď.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	*********			
Sec	tion	D: - RECORDKEEPING AND REPORTING (Part 262,	Subpar	t D)		
1	Ana	all test megults and analyses	YES	ОИ	NI	Remarks
	nee min	all test results and analyses ded for hazardous waste deter- ations retained for at least	V.			
Sec		ee years?  E: - INTERNATIONAL SHIPMENTS (Part 262, Subp				
1.		the installation imported or orted Hazardous Waste?		X	<del></del>	
		answered Yes, complete the following applicable.)				
	a•,	Exporting Hazardous waste; has a generator:				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

## PARKER DIVISION

OXY METAL INDUSTRIES CORPORATION • 32100 Stephenson Highway, Madison Heights, Michigan 48071 • Tel. (313) 583-9300

June 4, 1981

Mr. Ralph Feeney U.S. Environmental Protection Agency Region 5 Water and Hazardous Materials Compliance Section 230 South Dearborn Street Chicago, Illinois 60604

Re: EPA I.D. No. MID057676124

RCRA Inspection

Dear Mr. Feeney:

Per our phone conversation on May 27, 1981 concerning the RCRA Inspection conducted at our facility on March 11, 1981 by the Michigan DNR, I am writing to confirm our correction of the seven minor violations cited.

#### Citation 1. No mixed lab waste analysis plan

No analysis plan was available at the time of the inspection because no mixed lab waste had been disposed of at that time. Mixed lab waste consists of obsolete raw chemicals and small quantity of lab mixtures. These wastes are segregated by class and hazard, itemized and placed in DOT 55 gallon drums with the appropriate labels for storage until disposal.

#### Citation 2. "Danger" signs not posted

At the time of the inspection the signs were on order. The signs have been received and are posted on the exterior entrance to the main facility and on the door of the storage shed.

#### Citation 3. Training Records

Complete training records including job titles, training description and record of training were prepared and available prior to May 19, 1981.

#### Citation 4. "No Smoking" signs

At the time of the inspection these signs were on order. The signs have been received and are posted in the storage areas.



Mr. Ralph Feeney Page 2 June 4, 1981

#### Citation 5. Contingency Plan

An updated Contingency Plan and Emergency Procedures Manual is now available which indicates emergency coordinators, a list and location of emergency equipment and other items as specified in Subpart D.

#### Citation 6. Waste Drum Inspection

A hazardous waste inspection log is now being maintained. Storage areas and drums are inspected weekly for deteriorations, corrosion, leaking or bulging drums, compatibility of wastes, aisle space and any other function considered detrimental to a safe operation.

#### Citation 7. Placards

Placards for the transporter are available if required and we will varify proper truck placarding prior to the transporting of hazardous waste.

During our conversation you indicated the violations are minor and no further action is expected provided they are corrected. If there are any questions which I have not adequately answered, please notify me. It is hoped that this information will be sufficient to close out our file on this inspection.

Very truly yours,

PARKER DIVISION
HOOKER CHEMICALS & PLASTICS CORPORATION

George J. Beyer

Technical Support Manager

GJB/so

ENFORCEMENT 1981

PARKER DIVISION

OXY METAL INDUSTRIES CORPORATION • 32100 Stephenson Highway, Madison Heights, Michigan 48071 • Tel. (313) 583-9300

April 30, 1981

U.S. Environmental Protection Agency Region V RCRA Permits Branch 230 South Dearborn Street Chicago, IL 60604

Re: EPA I.D. No. MID057676124

Dear Sirs:

In compliance with our requirements under RCRA, our facility submitted to your office before November 20, 1980 a RCRA Part A permit application which authorizes us to operate hazardous waste storage and treatment facilities under Interim Status regulations.

In the Federal Register of November 17, 1980 (45 FR 76074 et seq.) the EPA promulgated amendments that suspend the applicability of the RCRA hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of certain wastewater treatment and neutralization units. We believe that the promulgated amendments of November 17, 1980 suspend the applicability of the above RCRA hazardous waste regulations to our wastewater facility. We desire to have our Part A permit application amended to reflect the fact that as a consequence of the November 17, 1980 amendments we will only require a RCRA permit for hazardous waste storage.

Our rational for the above belief is as follows:

The only hazardous waste treatment we conduct is the treatment of wastewaters in tanks associated with a system whose effluent water discharges to a POTW, and is subject to regulation under the pretreatment requirements, (i.e. 307 (b)) of the Clean Water Act.

We would appreciate guidance from the Agency regarding the procedure we must follow to effect the subject amendment to our RCRA Part A permit application. If amended Form 1 (EPA Form 3510-1) and Form 3 (EPA Form 3510-3) submissions will be required, we would appreciate the mailing of the subject blank forms to us.

We would also like to notify you of the merger on January 1, 1981 of Oxy Metal Industries Corporation into Hooker Chemicals & Plastics Corp. We are now The Parker Division, Hooker Chemicals & Plastics Corp.

Very truly yours,

George J. Beyer

Facility-Environmental Compliance Officer

GJB/so



05.11

# RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS TREATMENT, STORAGE, AND DISPOSAL FACILITIES Form 1 - General Facility Standards 122.7(i)

#### 

(A) Facility Name: PARKER DIVISI	ON - OXY METAL I	VOUSTRIES CORP.		
(B) Street: 32100 STEPHENSON	NWY.			
(C) City:	(D) State: _	MICNIGAN	(E) Zip	Code: 48071
(F) Phone: <u>583-9300</u>	· (G) Co	inty: OAKUND		
				8 6
(H) Operator: PARKER DIVISION		•		
(1) Street: 32/00 STEPHENSON	NWY.			
(J) City: MADISON NEIGHTS		w to the second	(L) Zip	Code: <u>48071</u>
") Phone: 3/3-583-9300	(N) Cou	nty: OSKLAND	******	
				*
(0) Owner: AS OF JAN 1, 1981,	NOOKER CHEMICAL	AND PLASTICS		
(P) Street: 32100 STEPHENSON	464			
(Q) City: MADISON NEIGHTS				Code: 4809/
(T) Phone: 3/3-583-9300	(U) Cou	inty: OSKISNO		
- * * * * * * * * * * * * * * * * * * *	100	Municipal		Private
(V) Type of Ownership:	State	County	i	
(W) Date of Inspection:	11, 1981 (Q) Time o	f Inspection (From)	9:45 p.m.	(TO)/100 R.M.
(X) Weather Conditions: <u>overca</u>	ST NORTHERLY U	INDS, COLD		
			دون المارية والمارية المارية ا	

Person(s) Interviewed	Title			Telephone "
MR. GEORGE BEHER	TECHNICA	AL SUPPOSET	MANAGER	313-583-9800
ME ARTHUR KLAIFGEL		y LEGAL C		313-533-9500
Inspection Participants	Title			Telephone
KEVIN TOLLIVER	ENGINEE	e - AIR QUA	CITY DIVISION	313-666-2700
SUSAN NORTON	WATER OU	12174 SPECIA QUALIT	<u>1LIST-WATE</u> R 4 DIVISION	313-379-9692
	_			
II. Descr	iption of Si	te Activi	ty	
11.			** ***********************************	
A) x Generator (Form 2)		(B)	_ Transporter	(Form 3)
C) X Chemical, Physical and Biological Treatment (	Form 4)	(D) <u>×</u>	_ Storage (Fo	orm 5)
E) 🟂 Landfill (Form 6)		(F)	_ Incineratio	on (Form 7)
G) Land Treatment (Form 4)		(H)	_ Thermal Tre	eatment (Form 7)
I) Comments:				
	, <u>-</u>			
		<u>-</u>		
Supplemental forms (Listed in Pinspected. Attach all Suppleme	arathesis) m ntal forms t	oust, be considered the constant of the consta	mpleted for e port.	ach activity
	Yes	No	Not Inspecte	See Remark d Number
(J) Has this facility Submitted a Part A Permit Application? 122.4	<u> </u>			

	•	<u> []].</u>	GENERAL FACI	LITY STANDARD	<u>S</u> - 265 Sub	part B MINO	596761Z4
. ,	√ં∧્			Yes	No	Not Inspected	See Rema Number
~ <i>j</i>	rias heet	the Regional Administrat n notified regarding:	or				
		•			•		
	1.	Receipt of hazardous waste from a foreign sou 265.12(a)	rce? /ca82E	-		Constitution and the Children Color	
	2.	Transfer of Ownership? 265.12(b)		ganggangambhili kidil kidil 1989.	<u> </u>	0	
3)	Gen	eral Waste Analysis:	· .	• •	•	•	
	1.	Has the owner operator of a detailed chemical and physical analysis of the 265.13(a)	•	R FILTER X PRESS SWIPGE	FOR MIXED LAB X WASTE		
	2.	Does the owner operator detailed waste analysis at the facility? 265.13(b)	have a plan on file	FOR FILTER PRESS SUDGE X	X		9494 <u>(                                 </u>
	3.	Does the waste analysis specify procedures for in and analysis of each move hazardous waste from off	nspection vement of -site?			•	***************************************
(C)	Sec	acity - Do security measu: عدی کاری کاری کاری کاری کاری کاری کاری کار		•			
,	1.	265.14 24-Hour Surveillance?		X .	uan .	· Paragrama	
		265.14(b)1		-			
	2.	Artificial or Natural Barrie: Around Facility 265.14(b)2	?	<u> </u>	·		<del></del>
	3.	Controlled Entry? 265.14(b)2ii		X	SIGNS ARE		<del></del>
•	4.	Danger Sign(s) at Entrance? 265.14(c)	: :	<u>*</u>	ON GROER -	IVERY	•
(D)	Do Ind	Owner Operator Inspection 1 265.15	ns	• • • • • • • • • • • • • • • • • • •			
	1.	Records of Malfunctions 265.15(a)1	?	<u>X</u>	<u> </u>		<del></del>
•	2.	Records of Operator Err 265.15(a)1	or?	<u></u>		· · · · · · · · · · · · · · · · · · ·	
	3.	Records of Discharges? 265.15(a)1		<u> </u>			
	4.	Inspection Schedule? 265.15(a)4		X			
	5.	Safety, Emergency Equip 265.15(b)1	ment?		<u></u>	#1450-10-10-10-10-10-10-10-10-10-10-10-10-10	AND
	6.	Security Devices? 265.15(b)1		<u> </u>	· <u></u>		ga military property and the second
	7.	Occupting and	T APPLICABLE	<u> </u>		managang permahan dikabah di kemerancan kecama sepanan g	n de la companya de l
	8.			<u> </u>		Problem William State State Control of the Control	

		Yes	No	N Inspected	See Remark Number
Do Personnel Include: 265.16(d) 1. Job Title	Training Records	•	<u> </u>	• •	
2. Descripti	on of Training?				
3. Records o	of Training?		<u>X</u>		
Is Personnel within the A	Training Complet Required Time Fran	ed X ne?			
Tanatable	uirements for Reactive, or e Wastes Addresse	<u> </u>			
2. No Smoki		ONNSIDE	ON ORDE	SNED	
3. Separati	ion and	_X			
	e and Operation		٠.		•
) Maintenanc	und open	*		•	
of Facilit  1. Is ther Explosion hazardo waste of 265.31	y:  Te any evidence of on, or release of ous waste or hazar constituent?  Facility have wing Equipment:	•	X NOT F		
of Facilit  1. Is ther Explosion hazardo waste of 265.31 Does the sollor 265.32 1. Alarm 265.32 2. Teleph 265.32 3. Portab	y:  The any evidence of fon, or release of four waste or hazar constituent?  Tacility have wing Equipment:  System?  (a) one or 2-Way Radi (b) le fire extinguis ontrol, spill content and decontaminal	os? X	NOT F SOUNCE NOT F	ENT SHED	

(E) Tosting and Maintenance of Emergency Equipment: 265.33 Recordkeeping required under 265.15(b)1  1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment?  2. Is Emergency Equipment Maintained in Operable Conditions?  (D) Has Owner Operator Provided Immediate Access to Internal Alarms. (if needed)? 265.34  (E) Is there Adequate Aisle Space for Unobstructed Movement? 265.35  (F) Are Arrangements with Local Authorities Included in Emergence Included Included in Emergence Included in Emergence Included in Emergence Included in Emergence Included In			eri	Yes	Мо	Not Inspected	See Remark Number
for Emergency Equipment?  2. Is Emergency Equipment Maintained in Operable Conditions?  (D) Has Owner, Operator Provided Immediate Access to Internal Alarms (if needed)? 265.34  (E) Is there Adequate Aisle Space for Unobstructed Movement? 265.35  (F) Are Arrangements with Local Authorities Included in presence of the Contingency Plan AND EMERGENCY PROCEDURES - 265 Subpart  V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - 265 Subpart  Does the Contingency Plan Contain the Following Information:  V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - 265 Subpart  Does the Contingency Plan Contain the Semina Under No. 1861 MOULD EMERGENCY PLAN WAS IN PROCEDURES - 265 Subpart  No. 1861 WINDERSON OF MARCH 1981.  1. The actions facility personnel must take to comply with \$264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter- measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)  2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency response teams to coordinate emergency response teams to coordinate emergency response teams	(0)	Emergency Equipment 265.33 Recordkeep 1. Has the Owner established T	nt: ping required under 2 or Operator esting and	65.15(b)1			
Maintained in Operable Conditions?  (D) Has Owner Operator Provided Immediate Access to Internal Alarms (if needed)? 265.34  (E) Is there Adequate Aisle Space For Unobstructed Movement? 265.35  (F) Are Arrangements with Local Authorities Included in PREDEMERTARY, the Operating Record? 265.37  V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - 265 Subpart  Does the Contingency Plan Contain the Following Information:  1. The actions facility personnel must take to comply with \$264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter- measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)  2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency response teams to coordinate emergency response teams to coordinate emergency response				<u> </u>	. *************************************		
Immediate Access to Internal Alarms (if needed)? 265.34  (E) Is there Adequate Aisle Space For Unobstructed Movement? 265.35  (F) Are Arrangements with Local Authorities Included in FIRE DEPARTMENT, the Operating Record? 265.37  V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - 265 Subpart  Does the Contingency Plan Contain the Following Information:  In the actions facility personnel must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter- measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)  2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services		Maintained in		<u>×</u>	•	Charles Control of the Control of th	
For Unobstructed Movement?  265.35  (F) Are Arrangements with Local Authorities Included in FIRE DEPARTMENT, the Operating Record?  265.37   V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - 265 Subpart  Does the Contingency Plan Contain the CONTINGENCY PLAN WAS IN PROCESS OF Following Information:  1. The actions facility personnel must take to comply with \$264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)  2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services	. ,	Immediate Access Alarms (if needed 265.34	to Internal )?	<u> </u>	Contract Angeles Contract		· White the second was the second with the sec
Authorities Included in FIRE DEPARTMENT, the Operating Record?  201110  V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - 265 Subpart  Does the Contingency Plan Contain the Following Information:  Following Information:  The actions facility personnel must take to comply with \$264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)  2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services	(E)	For Unobstructed		<u>x</u>	3-4 FBFT-	NOTH OF	
Does the Contingency Plan Contain the Contingency Plan Contain the Following Information:  1. The actions facility personnel must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)  2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services	(F)	Are Arrangements Authorities Inclu the Operating Rec	ded in FIRE DEPARTA	DENT,	***************************************	***************************************	
<ol> <li>The actions facility personnel must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)</li> <li>Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services</li> </ol>		_	ncy Plan Contain the	CONTINGE	NCY PLAN W	AS IN PROCEST	OF .
must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)  2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services	٠			READY Z	Y END OF MAR	20 N 1901.	
only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)  2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services	•	must take to §264.51 and 2 to fires, exp unplanned rel waste? (If the Prevention, C	comply with 65.56 in response losions, or any ease of hazardous e owner has a Spill ontrol, and Counter-				
police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services .		only to amend incorporate h management pr sufficient to	I that plan to waste covisions that are comply with the	<u>×</u>	-		
		police depart hospitals, co and local eme to coordinate	ments, fire departmentractors, and State ergency response team e emergency services	e			***************************************

See Remark

	•	Yes	No	Not Inspected	See Remark Number
3.	numbers (office and home) of all nersons qualified to act as		COILLE BE ADDED TO OPDATED CONTINGENC X	4 PLAN	
4	emergency coordinators? 265.52(d) A list of all emergency equipment at the facility which includes the	E LOG CE			
	of each item on the list and a FREE brief outline of its capabilities?	ATION OF XTINGUISNEED X	X :	S, ETC.	
5	265.52(e)  An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary?	y			
	(This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate	<b>V</b>	•		
* * *	evacuation routes:) 265.52(f)	<u>X</u> .	PLAN BEING		
	Are copies of Contingency Plan Available at Site and local Emergency Organizations?	alanguar Malanguar M	UPDATED		
(C)	265.53 Emergency Coordinator 265.55 265.55	•	÷		
•	<ol> <li>Is the facility Emergency Coordinator identified?</li> <li>Is Coordinator Familiar with</li> </ol>	<u>×</u>	***************************************		
	all aspects of site operation and emergency procedures?	X	**************************************		
	3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	×			• -
. <b>(</b> D)	Emergency Procedures	•	•	•	
	If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency procedures listed in 256.56?	*PPLICA	BLE X		

112 2810 76 16164

	vi . MANIFEST TYSTEM, R	ECORDKEEPING	, AND REPOR	TING -265 Subpar	~t E
		Yes	No	Not Inspected	See Remark Number
(A)	Use of Manifest System				
	1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	<u>, x</u>			
	2. Are records of past shipments retained for 3 years? NOT APPLICABLE 265.71(5)	Ε	) <del></del>	Annual space of the state of th	Western Street Control of the Contro
(B)	Does the owner or operator meet requirements regarding Manifest Discrepancies? NOT APPLICABLE	· · · · · · · · · · · · · · · · · · ·	· ·	gy	
(C)	265.72 Operating Record	•			•
	Does the facility maintain an operating record at the site as required in §265.73?				
(D)	Availability, Retention and Disposition of Records	•			
	Are all records available at the site for inspection as required in §265.74?	<u>x</u>			
		•	•		•
	VII . CLOSU	RE AND POST	CLOSURE - 26	55 Subpart G and	IН
(A)	Closure and Post Closure NOT APP	PLICABLE			
	1. Closure Plan Available for Inspection by May 19, 1981?		<del></del>		-
	<pre>265.112(a) 2. Has this plan been submitted to     the Regional Administrator?     265.112(c)</pre>	Al replantation of the College and			· · · · · · · · · · · · · · · · · · ·
	3. Has Closure begun? 265.112(c)			<u> </u>	·
	4. Is closure cost estimate available by May 19, 1981? 265.142				

(B) Post Closure Care and Use of Property
- Has the Owner Operator supplied a Post
Closure Monitoring Plan

(by May 19, 1981)?

265.117

Form 1 - Page 7

# RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS Form 2 - Generator Inspection 262

#### I. General Information:

(A)	Installation Name: PARKER DIVISION - OXY METAL INDUSTRIES CORP.
(B)	Street: 32100 SYEFNENSON HWY.
(C)	City: MADISON NEIGHTS (D) State: MICHESN (E) Zip Code: 40071
(F)	Phone: 3/3 583 9300 (6) County: OAKLAND
•	
(H)	Operator: Parese Division
(1)	Street: 32100 STEPENSON NWY
(J)	City: MADISON HEIGHTS (K) State: MIGHIGAN (L) Zip Code: 18071
1)	Phone: 3/3 583 9300 (N) County: OARLAND
(0)	Owner: AS OF JAN 1, 1981, NOOKER CHEMICAL & PLASTICS
(P)	Street: 32100 STEPHENSON HWY.
	City: MADISON NEIGHTS (R) State: MICHIGAN (S) Zip Code: 4807/
	Phone: 3/3 583 9300 (U) County: OAKLAND
•	Federal Municipal $X$ Private
(V)	Type of Ownership: State County
(K)	) Date of Inspection: Time of Inspection (From) 9:45 Lm. (To) 1:00 Pm.
(X)	Weather Conditions: OVERCAST NORTHERLY WINDS, COED.

(Y) Pers	son(s) Interviewed	Title	•	47	Telephone ·
MC.	GEORGE BEYER	TECZINI	CAL SUPPOR	TAXNACER	313-583-9200
	2 RETHUR KLUEGEL	Compony	LEGAL COU	<u> </u>	313 - 583-9300
<u> </u>				•	
(Z) lns	pection Participants	Title			Telephone
K	EVIN TOLLIVER	ENGINEER	AIR QUAZ	<u>174 Divi</u> sto	ON 313-606-2700
50.	TAN MORTON WATER	CHALITY S	y SPECIAL DIVISION	2/37	313-379-9692
			•		
•	II. OTHER TYPE	OF HAZARD	OUS WASTE	<u>ACTIVITY</u>	
(Z) Inspect		•		•	
(A)	Transporter (Form 3)		(B) <u>x</u>	Chemical, F Biological	Physical and Treatment (Form 4)
(c) _	Y Storage (Form 5)	. :	(D)	Landfill (I	Form 6)
(E)	Incineration (Form 7)		(F)	·Thermal Tre	eatment (Form 7)
•	•				
(0) 0.					
			7.4	·	
-			<del></del>		

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

#### III. MANIFEST

	Yes	No	Not Inspected	See Remark Number
(A) Are copies of the Manifest available? 262.23(a)3	· X	•		
(B) Does the Manifest contain the following information:		8/17	T HAYE BEEN ARKANO	GED TO RECOMALA
1. Manifest document number?	<u>×</u>			
<pre>262.21(a)1 2. Name, mailing address, telephone number, and EPA ID Number of Generator?</pre>			N/A	
262.21(a)2 3. Name and EPA ID Number of Transporter(s)?			n/z	
262.21(a)3 4. Name, Address, and EPA ID Number of Designated permitted facility and alternate facility?	• • •		N/A	
5. The description of the waste(s) (DOT shipping name, DOT hazard cla			N/A	
<ul><li>262.21(a)5 DOT information in CFR</li><li>6. The total quantity of waste(s) and the type and number of containers</li></ul>	49 172.101 d	, 172.202 a	nd 172.203	•
loaded? 262.21(a)6			N/A	
<ol> <li>Required Certification? 262.21(b)</li> </ol>			N/A	
<pre>8. Required Signatures? 262.23(a)1</pre>		**************************************	//2-	
(C) Does the Owner or Operator Submit Exception Reports when Needed?	EPORT FOR	MS PREPARES	,	
262.42	•			
IV. PRE-TRAN	Inspected Number  Inspected Number  Italia the  Italia			
	·	• •		
(A) Is Generator Packaging waste in accordance with DOT Regulations?	S NOT APP			
262.30 49 CFR Parts 173.178 and 179 (B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials:	_	T APPLY		
262.31 49 CFR Part 172  1 If required, are placards available to transporter?  NOT REQUIRED		X		
262.33 49 CFR Part 172 Subpart F	Inspected Number  X  E  FORMS MANE NOT SEEM MEEDED VET BOT NAVE SEEM MEEDED VET FOR NAVE SEEM MEEDED VET REQUIRED INFORMSTON ACCURATELY  REQUIRED INFORMSTON ACCURATELY  N/A  IN/A			

No

		·				
(D)	Pre-	shipment Accumulation:				
		Are containers marked with		•	•	•
	1.	start of accumulation date?		<u>X</u>		***************************************
		Start of accommutation of the		<del></del>		
		262.34(a)3 Are the containers of hazardous				
	2.	waste removed from installation				•
		before they can accumulate for				•
		Defore flies can accommend to	•	X		A 6. T/ \
٠		more than 90 days? 262:34(a)1 If no, the facility must be	<b>Étorage</b>	or disposa	1 facility 26	2.34(D)
٠	_	Are wastes stored in containers				•
	. క	managed in accordance with 40 CFR				
	*	Part 265.174 and 265.176 (weekly	. •			
		inspections of containers, containers		WEEKLY	25 m	
		holding ignitable or reactive wastes	annieri "	INSPECTIONS	en e	
		located at least 15 meters (50 Feet) $\omega$	150' LIMIT	NOT YET BEGUN		
	•	from facility's property line?	ĺΧ	<u> </u>		
		Trom facility, a property			*	
		Are wastes stored in tanks managed				A
-	4.	according to the following: NOT APP	PLICABLE	5		$(x_1, \dots, x_n) = \frac{x_n}{n} = \frac{x_n}{n}$
		. according to the fortuning.				
		a. Are tanks used to store only those	•		* .	
		wastes which will not cause corrosion		,		
		. leakage or premature failure of the				
		tank? NOT APPLICABL			•	
		265.192(b)	•	•	•	
•	•	b. Do uncovered tanks have at least	<u>-</u>			
		60 cm (2 feet) of freeboard, or dikes		•		
		or other containment structures?			·	_
		or of let concernation services		<del></del>		•
	• •	<ul><li>265.192(c)</li><li>c. Do continuous feed systems have</li></ul>			4	
	•	c. Do Continuous rece systems	·	·		·
		a waste-feed cutoff?			•	•
		265.192(d) d. Are required daily and weekly	•	•	·	
	•	d. Are required daily and works	•			
•		inspections done? 265.194				. •
		e. Are reactive & ignitable wastes				•
		in tanks protected or rendered non-				
*		reactive or non-ignitable? (If waste			-	
		is rendered non-reactive or non-				•
		is rendered non-reductive of home	•			
		ignitable, see treatment				<u> </u>
		requirements?			· ·	• .
		265.198, 265.17				•
		f. Are incompatible wastes stored				
		in separate tanks? (If not, the				
		provisions of 40 CFR <u>\$265.17(b)</u>				· · · · · · · · · · · · · · · · · · ·
٠		apply) 265.199	<u> </u>	<del></del>		
		200.100		•	,	

### V. GENERAL FACILITY STANDARDS - 262.34(a)5, 265.16, 27 Subparts C and D

If generator is also a  ${}_{1}SD$ , omit section  V 

			v	NOT APPLICA.	BLE Yes	No		Not Inspected		See Remark Number
ř.	ind	clude	onnel training re :	cords						
		265.	Titles? 16(d)]	2		<del></del>			-	
		265.	ription of Traini 16(d)3	ny:			-	<u></u>	•	
	3.	265.	rds of Training? 16(d)4 ersonnel Training	Completed		·, • • • • • • • • • • • • • • • • • • •			<b>-</b>	
-			in the Requried T		-				• . ₋	
В.	Pre		ness and Preventi Subpart C	on		•				
	1.	Mai	ntenance and Oper Facility:	ration					:	•
			Is there any evi explosion, or re hazardous waste waste constituer	elease of or hazardous	· .			•	_	-
	2.		265.31 s the Facility halowing equipment?					• · ••••··		
			Alarm system? 265.32(a)		Almedia de la composição	<del></del>		***************************************	<u>.</u> .	
	_	<b>b.</b>	Telephone or 2-1 265.32(b)		S <del>y</del>		·		<del>-</del>	
incl 265. 1. J 2. D 2. D 3. R 2 1. W B. Prep	C.	Portable fire ex fire control, sp equipment and de	oill control			•				
		Ind	equipment? 265.32(c) licate the volume	of water and/or	foam avail	able for	 r fire	control	<del>-</del>	
		265.32(d)	or made. and, or				•	•		
•										
	3.		ting and Mainten rgency Equipment				•			
		a.	Has the Owner or established tes Maintenance Pro-	ting and cedures				•	, •	
		b.	for Emergency E- 265.33 Is emergency eq		<del>6</del>	<del></del>			_	
265 2. Des 265 3. Rec 265 1. S with the part of the pa		Maintained in O Condition?		· .			•			
			265.33						÷	

	NOT APPLICALE	Yes	No	Not Inspected	See Remark Number
4.	Has Owner/Operator Provided - Immediate Access to Internal -Alarms (if needed)?		<del>da periodo antidos frese</del> <del>serviçõe</del>	gan and the second of the seco	Control Control Control Control
5.	265.34(a) Is there adequate Aisle Space		•		•
6.	265.35 Are arrangements with local				
	operating record?	green committee of the second			
(C) C	ontingency Plan and Emergency	Inspected Number  Provided to Internal  ??  Aisle Space Movement?  with local ded in the  I Emergency  ency plan owing:  facility personnel oly with \$264.51 sponse to fires, ny unplanned dous waste? (If the i Prevention, Control res (SPCC) Plan, he needs at plan to incorporate management provisions ent to comply with of this Part)  agreed to by local ts, fire departments, actors, and State and response teams to ency services, pursuant  esses, and Phone and Home) of all id to act as emergency  I emergency     facility which include i physical description the list, and a brief tapabilities?  on plan for facility there is a possibility could be necessary? describe signal(s) egin evacuation, es and alternate			
_	April 1980 - April	•			
Alam 265 5. Is for 265 6. Are authorized 265 1. Doe continus and express own and express that the bollow continue contin	concain the following:				
	must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned				Number
	owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he no	eeds	**************************************		
	hazardous waste management provisions that are sufficient to comply with the requirements of this Part)	•		* North Con-	
•	hospitals, contractors, and State and local emergency response teams to				
Immediate Access to Internal Alarms (if needed)? 265.34(a)  5. Is there adequate Aisle Space for unobstructed Movement? 265.35  6. Are arrangements with local authorities included in the operating record? 265.37  (C) Contingency Plan and Emergency Procedure  1. Does the contingency plan contain the following:  a. The actions facility personnel must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)  b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and					
•	<pre>numbers (office and Home) of all persons qualified to act as emergency coordinator.</pre>		•	• · ·	Assessment to the second
	d. A list of all emergency equipment at the facility which inclu the location and physical description of each item on the list, and a brief	7			
	<b>265.</b> 52(e)				•
	personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s)	ty			:
	evacuation routes and alternate evacuation routes.		Market and the second s	Angelogical Control of the	·
	265.52(f)				

avaitable Emer 265 3. Emer 265 a. b. c. (A) Are Ma Except Result at lea 265.7 (A) Has the Export 262.50 1. Export 262.50	NOT APPLCABLE	Yes	No	Not Inspected	See Remar Number
2	. Are copies of the Contingency Plan				
	Are copies of the Contingency Plan available at site and local Emergency Organizations? 265.53 Emergency Coordinator 265.55 a. Is the Facility Emergency Coordinator Identified? b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures? c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?  Emergency Procedures  If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in \$256.562  VI. RECORDKEEPING  The Manifests, Annual Reports, Exception Reports, and All Test Essults and Analyses Retained for Least three years?  VII. INTERNATIONAL SHIPMENTS  as the Installation Imported or Exporting Hazardous Waste, Applicable has a generator:  a. Notified the Administrator in writing? 252.50(b)1	E			
3	265.55				
		<del>(1111-1111-1111-1111-1111-1111-1111-11</del>	·	40-40-40-40-40-40-40-40-40-40-40-40-40-4	· · · · · · · · · · · · · · · · · · ·
	all aspects of site operation	Inspected Number  a Contingency Plan a and local acations?  metor  ity Emergency Identified?  or Familiar with of site operation y Procedures?  rgency Coordinator hority to carry out nory Plan?  ures  Situation has facility; has ordinator followed ocedures listed in   VI. RECORDKEEPING  vis Retained for 'S? NOT APPLICABLE  Inspected Number  Inspected Number  Number  Rumber  Number  Numbe	<del></del>		
	Are copies of the Contingency Plan available at site and local Emergency Organizations? 265.53 Emergency Coordinator 265.55 a. Is the Facility Emergency Coordinator Identified? b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures? c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?  Emergency Procedures  If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Coordinator followed the Emergency Procedures listed in §256.562  W. RECORDKEEPING  2. Manifests, Annual Reports, suption Reports, and All Test sults and Analyses Retained for least three years?  W. RECORDKEEPING  St. INTERNATIONAL SHIPMENTS  St the Installation Imported or ported Hazardous Waste? 2. 50  (If A was answered Yes, then complete one or both of the following)  Exporting Hazardous waste, has a generator:  a. Notified the Administrator in writing? 266.50(b)) Obtained the Signature of the foreign consignee confirming celivery of the waste(s) in the				
	2. Are copies of the Contingency Plan available at site and local Emergency Organizations? 265.33 3. Emergency Coordinator 265.55 a. Is the Facility Energency Coordinator Identified? b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures? c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?  4. Emergency Procedures  If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in \$256.563  W. RECORDKEEPING  Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years?  WIL INTERNATIONAL SHIPMENTS  A Has the Installation Imported or Exported Hazardous Waste? 265.71(a)5  VII. INTERNATIONAL SHIPMENTS  A Has a generator:  a. Notified the Administrator in writing? 262.50(b)1 b. Obtained the Signature of the foreign corsignee confirming colivery of the waste(s) in the				
	•	•	: , •	•	
• .	4. Emergency Procedures  If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.56?  VI. 1				
- available at site and local Emergency Organizations? 265.53 3. Emergency Coordinator 265.55 a. Is the Facility Emergency Coordinator Identified? b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures? c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?  4. Emergency Procedures  If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.562  VL. RECORDKEEPING  (A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years? NOT APPLICABLE 265.71(a)5  VII. INTERNATIONAL SHIPMENTS  (A) Has the Installation Imported or Exported Hazardous Waste? 262.50  (If A was answered Yes, then complete one or both of the following)  1. Exporting Hazardous waste, has a generator: a. Notified the Administrator in writing?	• .				
	2. Are copies of the Contingency Plan available at site and local Energency Organizations? 265.33 3. Emergency Coordinator 265.35 a. Is the Facility Emergency Coordinator Identified? b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures? c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?  4. Emergency Procedures  If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in \$256.562  W. RECORDKEEPING  A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years? Nor APPLICABLE 265.71(a)5  VII. INTERNATIONAL SHIPMENTS  A) Has the Installation Imported or Exported Hazardous Waste, has a generator: a. Notified the Administrator in writing? 262.50(b)1 b. Obtained the Signature of the foreign consisence confirming delivery of the waste(s) in the				
(A)	Are Manifests, Annual Reports, Exception Reports, and All Test				
	Results and Analyses Retained for at least three years? NOT APPLICABLE	£		S	
	2. Are copies of the Contingency Plan available at site and local generomy Organizations? 265.35 3. Emergency Coordinator 265.35 a. Is the Facility Emergency Coordinator Identified? b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures? c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?  4. Emergency Procedures  If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in \$256.562  VI. RECORDEEEPING  (A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years?  VI. INTERNATIONAL SHIPMENTS  (A) Has the Installation Imported or Exported Hazardous Waste? 262.50  (If A was answered Yes, then complete one or both of the following)  1. Exporting Hazardous waste, has a generator:  Notified the Administrator in writing? 262.50(b))  Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the				
•	VII. INTERN	ATIONAL S	HIPMENTS		
(A)			V		
	•			the following)	
	<ol> <li>Exporting Hazardous waste,</li> </ol>	PLICABLE			• •
		RECORDKEEPING  Omplete one or APPLICABLE	-	• · · · · · · · · · · · · · · · · · · ·	
	262.50(b)1  b. Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the	and the second s		· <del>· · ·</del>	•

	• •			Yes	No	Not Inspected	See Remark Number
		NOT APPLICABLE				•	
•	•		·		,*		
	c.	262.50(b)3	nrements:	TOTAL COLUMN TO THE PARTY OF TH	-	Secretary Secretary - resulting and resultin	- CS-may-48 r- 4-8-27 (E) to - \$4 r- 4-may-1-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12-may-6-2-12
2.	has	the generator: 262.50(d)	•				- <del> </del>
-		:			•		
			VIIL PREPA	RER INFO	ORMATION		
c. Met the Manifest requirements?  262.50(b)3  2. Importing Hazardous Waste, has the generator: 262.50(d) a. Met the manifest requirements?  VIII PREPARER INFORMATION	· · · · · · · · · · · · · · · · · · ·						
lame:	<u>5</u> 2	ISAN NOKTON, WATER (	BULLITY SPEC	ILLIST	WATER O	URLITY DIVISIO	eN-313-379-969
itle:	KE	Met the Manifest requirements?  262.50(b)3  Orting Hazardous Waste, the generator: 262.50(d)  Met the manifest requirements?  VIIL PREPARER INFORMATION  VISLAN NORTON, WATER QUALITY SPECIALIST WATER QUALITY DIVISION - 313-379-969  VIN TOLLIVER, ENGINEER, SIR QUALITY DIVISION - 313 666 7500					
		·			•		
	•			,			
c. Met the Manifest requirements?  262.50(b)3  2. Importing Hazardous Waste, has the generator: 262.50(d) a. Met the manifest requirements?  VIIL PREPARER INFORMATION  Name: Susan Nordon, Water Quality Specialist Water Continues, Engineer, Air Quality Division— Phone Number:							
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## RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS Form 3 - Transporter Inspection (263) NOT APPLICABLE

#### I. General Information:

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ity:	-		(K)	State: _			(L) Z	Tip Code:	
				(N) Count	y:	·			
	• •			• ,		•		. •	
Owner:				·					
									·
City:			(R)	State: _			(s)	Zip Code:	
Phone:				_(U) Coun	ty:		•		•
÷	· ·						•	•	
Type of O	wnership:		State	. •	Cc	ounty			
Date of I	nspection:		·	Time of	Inspecti	on (From)		(To)	<del></del>
Weather C	onditions:		·			<u>, ,</u>			
	perator: treet: ity: hone:  ity: hone:  ity: ohone:  ype of 0 Oate of I	perator:  treet: ity: hone:  wner: ity:  hone:  ype of Ownership:  Oate of Inspection:	perator:  treet: ity: hone:  wher: ity:  hone:  ype of Ownership:  Oate of Inspection:	perator: treet: ity:(K) hone:  where: ity:(R)  hone:  Federal Type of Ownership:State	hone:         (G) Count           perator:         (K) State:           ity:         (N) Count           dwner:         (N) Count           city:         (R) State:           city:         (U) Count           Federal         State           Oate of Inspection:         Time of	perator:         (G) County:           treet:         (K) State:           ity:         (N) County:           dwner:         (I) County:           Street:         (U) County:           Phone:         Federal         Mu           Type of Ownership:         State         County:	Departor:	perator:         (G) County:           treet:         (K) State:         (L) Z           thone:         (N) County:         (S) County:           dwner:         (N) County:         (S) County:           dwner:         (U) County:         (S) County:           Phone:         (U) County:         (S) County:           Image: County of the co	ity:       (K) State:       (L) Zip Code:         chone:       (N) County:         dwner:       (Sitreet:         city:       (R) State:       (S) Zip Code:         chone:       (U) County:         Federal       Municipal       Frivate         Type of Ownership:       State       County         Date of Inspection:       Time of Inspection (From)       (To)

y) Person(s) Interviewed	Title	?	Te	l ephone
(Z) Inspection Participants	Title	e	Te	elephone
(2) 11135000			-	
			· · · · · · · · · · · · · · · · · · ·	
	•			
II. OTHER T	TYPE OF HAZI	ARDOUS WASTE	ACTIVITY	
(A) Generator (Form 2)		(B)	Chemical, Phys	sical and eatment (Form 4
(C) Storage (Form 5)	•	(D)	Landfill (For	• 1
(E) Incineration (Form 7)		(F)	Thermal Treat	ment (Form 7)
(G) Comments:				
		*		
	· · · · · · · · · · · · · · · · · · ·			
Supplemental forms (Listed in inspected. Attach all Supplemental Suppl	Parathesis mental form	) must be co ns to this re	ompleted for eac port.	h activity
	III. RECO	PRDKEEPING	•	•
	Yes	No	Not Inspected	See Remark Number
(A) Are Copies of the Completed Manifest(s) or Shipping Paper Available for Review and Retained for Three Years?  263.22(a)	·(s)			

		•					5 0
		NOT AF	CABLE	Yes	No	Not Inspected	See Remai Number
							,
	Does the Transpo Manifest the Dat	rter Record of e the Waste le	: L (1 + J),	· · ·			
3.	263.20(f)1 Are Completed Ma	nifest(s) on l	1 7 mg				
	9 \$16 N F 263.22(a) and 26					·	
	203.22(a) and 20	3.20(1)2	V. MIS	CELLANEOU	<u>s</u>	.•	
	•	•					•
Α.	Does Transporter Hazardous Waste U.S. from Abroa	into the					
В.	.263.10(c)1	orter Mix			• •		
•	Hazardous Waste DOT Shipping De by Placing them	scriptions	3		•		
* .	Container? 263.10(c)2 TE: If (A) or (E	• .					
	263.10(c)	with the Gene		RER INFORM		e distriction	
		-	1. 111111	YER INTOK	IATTON .		
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### RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS TREATMENT, STORAGE, AND DISPOSAL FACILITIES Form 4 - Chemical, Physical and Biological Treatment/Land Treatment 265 - Subpart Q

#### I. General Information

A) Facil	ity Name: PARKER DIVISION - OXY METAL	- INDUST	RIES S	20 <i>R.P.</i>	
B) Stree	t: 32100 STEPHENSON HWY.				194.2
(c) City:	MADISON NEIGNTS (D) State:	MICNIG	AN	(E) Zip Cod	e 4307/
(F) Phone	2: <u>313-583-9300</u> (G)	County:	ONR	ZUND	· · · · · · · · · · · · · · · · · · ·
•	II. Chemica	al, Phys	ical a	and Biological	
ON 157	TREATED BEFORE DISCUSSES TO Treatment SANITARY SEWER	not / Cut	part (	),	
		Yes	No	Not Inspected	See Remark Number
1.	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401(b)	Χ		•	
2.	Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)? 265.401(c)	X			
3.	Has the owner or operator addressed the waste analysis requirements of 265.402? and 265.13			NOT APPLICA BLE	
4.	Are inspection procedures followed according to 265.403?	λ			
5.	Are the special requirements fulfilled for ignitable or reactive wastes?	X		NOT AFPLICABLE	NO REACTIVE OR IGNITABLE WASTE
6.	Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406		¥		PUT INSYSTEM.

III. Land Treatment (Subpart M) 265

:	MOT DEPLICABLE	Yes	No	Not Inspected	See Remark Number
1.	Is hazardous waste capable of biological or chemical degradation? 265.272(a)				
2.	Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)? 265.272(b&c)				
3.	Is waste analysis according to 265.273? and 265.13				
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 255.276?				
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278(a)				
6.	Does the unsaturated zone monitoring plan address the minimum information specified in 265.278(b and c)?				ten fai
7.	Are records kept regarding application dates and rates, quantities, and location of all hazardous waste placed in the facility? 265.279	on			
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? 265.281				
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies.) 265.282				

# RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS 265 - Subparts I,J,K, and L I. General Information

(A) Fac	ility Name: PARKER DIVISION, OXY METALS INDUSTRIES CON	P.		<del></del>	
(B) Str	reet: _ 32100 STEPHENSON NWY.	<del></del>	·		<del>,,,,</del>
(c) Cit	ty:		(E)	ZIP Code -	13071
(F) Dat	te of Inspection: 3/3-503-9300				
•	II. Storage Facility Standard	s (Par	-t 26	5)	•
A. Fa	acilities which store containers of hazardous waste (Sub	part 1	() 26	5	
		YES	NO	NOT IN- SPECTED	REMARK
1.	Are containers in good condition? 265.171	X			
2.	Are containers compatible with waste in them? 265.172	X			
3.	Are containers stored closed? 265.173(a)	X			,
4.	Are containers managed to prevent leaks? 265.173(b)	Х			
5.	Are containers inspected weekly for leaks and defects? 265.174	X			·
6.	Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	У			
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	X 177(a)		•	·
8.	Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?  265.177(c)	章	X	NOT SPPLICABLE	
B. F	acilities which store hazardous waste in tanks (Subpart	J) NO	>> XA	PPLICABLE	
1.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?  265.192(b)				
2.	Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? 265.192(c)				
	Continued on next page			Form 5 - 1	Page ]

•		YES	NO		IN-	REMARK #	
	To continuous feed systems have a waste-feed cutoff?	265.1	92(d)				
<del>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</del>	re waste analyses done before the tanks are used to store a substantially different waste than before?	265.1	93(a)				
5.	Are required daily and weekly inspections done? 265.19	4				<u>'</u>	
5.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.198						
7.	Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) 26	55.199			_		
	NOT APPLICAE acilities which store hazardous waste in surface impou	ತ೭೬ ndment	s (Su	bpar	t K) 26	55	
	Do surface impoundments have at least 60 cm (2 feet)						
. 1.	of freeboard? 265.222						
2.	Do earthen dikes have protective cover? 265.223		_				
3.	Are waste analyses done when the impoundment is used to store a substantially different waste than before	? 265	.225(2	a)	-		
,	Is the freeboard level inspected at least daily? 265	.226(a	)1		e essencial		
5.	Are the dikes inspected weekly for evidence of leaks or deterioration? 265.226(a)2						
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impound ment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.299(a)1	e -					ا هیامان سیسی
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230				-		·
D.	Facilities which store hazardous waste in waste piles	(Subp	art L	) 26	5 NOT	- APPLICAB	ZE
1	. Are waste piles covered or protected from the wind?						
2	. Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252						
3	. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)	265.25	3	<del></del>			
province and the second	Are reactive & ignitable wastes rendered non- reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable see treatment requirements.) 265.256(a)1	?					
dera state sandrian							

	NOT APPLICABLE	YES   M	NOT IN-	REMARK #
5.	Are piles of reactive or ignitable waste protected?			
۴	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265	.257(a)		
7.	Are piles of incompatible waste protected by barriers or distance from other waste? 265.257(b)			

EPA THENTIFICATION NUMBER

### RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS FORM 6 - LANDFILL INSPECTIONS

265 - Subpart N NOT APPLICABLE

### 1. General Information

(A) Faci	lity Name:					• .
(B) Stre				····		
(C) City	• .	(D) Stat	te:		(E) Zip Code	2
	of Inspection:					·
	II. Land	dfills	Yes	No .	Not Inspected	See Remar Number
(A) Gene	eral Operating Requirements s s the facility provide the f	ollowing:				
*1.	Diversion of run-on away fr portions of the fill? 265.	om active 302(a)	<u> </u>	-		
*2	Collection of run-off from portions of the fill? 265.	active . 302(b)	-	· ·		
*3. 4.	Control of wind disposal of	302(b)			•	
<b>(</b> * E	(ffective 11-19-81)	•				
(B) Sur Doe	rveying and Recordkeeping - es the Operating Record Incl	ude:				
1.	A map showing the exact locand dimensions of each cel 265.309(a)	1?	•			
2.	The contents of each cell location of each hazardous type within each cell? 265.309(b)	and the waste	-			

See Remar

Not

T APPLICABLE

G.

	Yes	No	Not Inspected	See Remar Number
3. Does the landfill have a functional leachate collection system? 265.314(a)1	4 Circles and Address	******		
4. Are free liquids stabilized prior to or immediately after placement in the landfill? 265.314(a)2				
Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?  265.315(a)	****************	in the state of th		****

- FORM 7

### RCRA INSPECTION REPORT-INTERIM STATUS STANDARDS SUPPLEMENTAL FORM FOR THERMAL TREATMENT (AND INCINERATORS)

NOT APPLICABLE

265 - Subparts P and O I. General Information

() Facility Name:					·		
3) Street:							
C) City:				•		(E) Zip Co	de:
F) Date of Inspection:							
	II.	Determin	ation	of Stead	iy Stat	<u>te</u>	
A. Type of unit (i.e., type	e of incin	erator o	or ther	mal tre	atment)		
B. Components and steady s	tate condi	tion:	I 265	. 343	Th 2	65.373	
Component		. 女女女?	* Was t	his com	ponent	at SS prior	to adding waste
Component	•		•	Yes	No	Not Inspected	See Remark #:
		:	·	•			
2		•		•			
			•		-	· ·	
1			•				
5.			•	•			
	111	. Waste 265.		is			
A. Mininum requirements, f	for wastes	not pre	viousl	y burned	i/trea1	ted.	
1. Required analyses; analysis been peri- for the following:	formed	TH 265.375	•	Yes	No	Not Inspected	See Remark #:
a. Heating value				***************************************	<del></del>		
b. Halogen content	t					- 1944	
c. Sulfur content		•			· <u></u>	ز <del>مستنس</del> س	
•							

be substituted for analysis for these. Are either present	•	Yes	No	Not Inspected	See Remark #;
for: I Th a. Lead? 265.345 265.375		·			
b. Mercury?		·			
Other parameters for which the waste establish steady state or determine the Note in Remarks any which you feel should be seen as the state of the s	110 01000	~ ~ ~ ~		ner or opera which may b	tor to e emitted. See Remark #:
1	au-				<u>*************************************</u>
2.				• ,	
. 4.					· ·
3		•	•		
4.					
	•				
5					
IV. Monit	i	d Inch	ertions		
IV. MONI				and the second second	
A. Combustion/emission control instrume	ents	Yes	No	Not lnsp.	See Remark #
monitored at least every 15 minutes 1 265.347(a)1 Th 265.377(a)1	•		<del> </del>		
B. Steady state maintained or correcti	ons			•	·
attempted? I 265.347(a)1 Th 265.377(a)1			<u> </u>		
n. Stack plume observed at least hours	У			•	
for normal color and opacity? I 265.347(a)2 Th 265.377(a)2			<u> </u>		
n Did any stack observations made by				. •	
owner or operator show a plume dir-	•				
ferent than normal?* I 265.347(a)2 Th 265.377(a)2	•		<del>ــــــــــــــــــــــــــــــــــــ</del>		
E. If yes to D above, were corrections	3				
made to return emissions to normal appearance?*	•	•			
appearance:		•	<del></del>		•
1 265.34/(a)2 in 203.3//(a)2	_			•	· · · · · · · · · · · · · · · · · · ·
I 265.347(a)2 Th 265.377(a)2  F. Complete unit and associated equip-	i11s.				•
F. Complete unit and associated equipment inspected daily for leaks, spi	ills,	-			
F. Complete unit and associated equipment inspected daily for leaks, spiand fugitive emissions? I 265.347(a)3 Th 265.377(a)3	1115,	gg, solve of the first section of			
F. Complete unit and associated equipment inspected daily for leaks, spiand fugitive emissions?	m eration?				

### V. Open Burning NOT APPLICABLE

Only complete this part if the facility open burns hazardous waste.

1.	Does this facility burn only waste explosives?  (A No answer means other hazardous waste is open-	:	Yes	No	Not Inspected	See	Remark #:
	burned.) 265.382		-			*	
2.	If this facility open- burns waste explosive,					·	÷
	does it burn the waste at a distance greater					•	
•	than or equal to the mirimum specified distance (below)? 265.382	· ·	<b>9</b> 442-0	<del></del>	· · · · · · · · · · · · · · · · · · ·		-

Inspector(s):	Susan Norton WATER QUALITY DIV.	1510N D.N.R.	(Sign and	Date)
	Kevin L. Tolliver, AIR QUALITY	MARCH 11, 1981		•
				•

265.382

Pounds of waste explosives or propellants	s Minimum distance from open burning or detonation to the property of others				
0 to 100	380 m 530 m	670 ft 1.250 ft 1,730 ft 2,260 ft			

MID = 7676.124

EPA IDENTIFICATION NUMBER

265.11

# RCR^ INSPECTION REPORT - INTERIM STATUS STANDARDS TREATMENT, STORAGE, AND DISPOSAL FACILITIES Form 1 - General Facility Standards 122.7(i)

I. General Information: (265.74)

(A)	Facility	/ Name	PARKER	_ Division	014	Trie Trie	1, . D. C. C.	ir r	
(B)	Street:	321	00 57	TEPHONION 1	twy				STATE OF STREET STREET, STREET
(C)	City:	PUYAL	DAK	(D) Star	te: <u>  10 0</u>	(1116-11)	(E)	Zip Code:	48071
(F)	Phone: _	583	6-9300	· (G	) County:	1.1V	LAND		Thinks the make in the property of the second sec contact.
	•			<b>4</b>		* ()			
(H)	Operator	1	AFKER	DIVISION		nus mannes - station in 1877 to be for a second (Person			derit service integrapes environmental
(1)	Street:	3210	O STE	PHONSON L	uy.	did to the second the second and second second the second the second the second second the second se		e egi samuningan makang ang ang ang	Direct of Spatial St. Spanish Medicines of the
(J)	City:	Rey	U DAK	(K) Sṭa	te: <u>///</u>	CHICAN	(L)	Zip Code:	48671
	•			(N)		8			
).	. 201	E 20	<b>2</b> (20)	e e e t		e e			
(0)	Owner: _	Hook	ER CH	EMICAL AN	n Pia	STICS	<u> </u>	1.	Dan en gyl gall led all segmen
				STEPHENSO					
				(R) Sta		(*)			· k
853				<u>د (</u> U)			- 19		
			•	Federal	Section of the Control of the Contro	_ Municipal		× Privat	:e
(V)	Type of	Ownership		State	-	County			
(W)	Date of	Inspectio	on: <u>63-</u> /	<u>//-8/ (Q) Tim</u>	e of Insp	ection (Fro	om) <u>/o</u> = 0	(To)_	
(X)	Weather	Condition	s: <u>rif</u>	REAST NOR	71 (6)	1105 C			
	-				e diament i i i i i i i i i i i i i i i i i i i			The state of the s	

y) Person(s) Interviewed	Tit		•	пернопе
GEORGE BOVER	17.	MediCAL SEPP	RT Mas .	58 4 / 132 C.
ARTHUR KLUEGEL		ATTORNEY		583 - 9-38-4
Z) Inspection Participants	Tit		<b>/</b> -	elephone
KOVIN L. TOLLIVER	1	NOTWEER -	$-\Lambda QD$ (3	13) 666-27
SE NORTON	<u>luh</u>	ZRQUAL SPEC	-wad	313) <i>379 - 969</i>
	and the second s	the second secon		
		r ris - residue		
II. Desc	cription of	f Site Activi	<u>. Y.</u>	4
•	,			- • •
(A) Generator (Form 2)		(B)	_Transporter (F	Form 3)
(C) Chemical, Physical and Biological Treatment	(Form 4)	(D)	Storage (Form	5)
/ \Landfill (Form 6)		(F)	_ Incineration	(Form 7)
(G) Land Treatment (Form 4)			_ Thermal Treat	ment (Form 7)
(I) Comments: PARVER DAY ME CAL	12411-1115	Two apro	Pards . A. M. C.	1) T. KETE
FILTER PROSE SCHOOL AND				
They Apply A Theorems	FACILITY	1387 MT 101	CT 56450 . TV	CH CHERT
THERE LAS WASRIAGE FREEZE			and the second s	
		•		
Supplemental forms (Listed in inspected. Attach all Supple	Parathesis mental for	s) must be cor ms to this re	npleted for each	1 activity
•	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A	$\int$			,
Permit Application? 122.4		ghystogeningen, des, de 1880/1481- <del>(hystosius</del>		4.2 5. (2)

٠.			Yes	No a	Not Inspected	See Remain Number
(A)		s the Regional Administrator en notified regarding:				
	1.	Receipt of hazardous waste from a foreign source? 265.12(a)	<b>Gridinishin</b>		NET APPLICAL	ue   1
	2.	Transfer of Ownership? 265.12(b)	- Committee of the Comm			•
(3)	Ger	neral Waste Aralysis:	•		•	
	1.	Has the owner operator obtained a detailed chemical and physical analysis of the waste? 265.13(a)	FILTER PRESS SLUDGE PENSIE	MIXED WASTE		2
	2.	Does the owner operator have a detailed waste analysis plan on fi at the facility? 265.13(b)	le X			
	3.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 265.13(c)	•	(	WT ATPORTABL	3
(C)	Sec	curity - Do security measures includ 265.14				
,	١.	24-Hour Surveillance? 265.14(b)1 op	<u>x</u> . A	·D. 75 3	YETE AR	
	2.	Artificial or Natural Barriel Around Facility? 265.14(b)2	Χ			
	3.	Controlled Entry? 265.14(b)2ii	Sirt Million - white age to a particular	The state of the s		
	4.	Danger Sign(s) at Entrance? 265.14(c)	•	X	AWAITING .	. 4
D)	Do Inc	Owner,Operator Inspections lude: 265.15		<del></del> ,		And the latest the standard and the stan
	١.	Records of Malfunctions? 265.15(a)1	<u> </u>	designation of the second		***************************************
	2.	Records of Operator Error? 265.15(a)1	<u> </u>	Rest to Delengan and the second	The state of the s	
	3.	Records of Discharges? 265.15(a)1	<u> </u>	, a		
	4.	Inspection Schedule? 265.15(a)4	<u> </u>	-		
	5.	Safety, Emergency Equipment? 265.15(b)1	<u> </u>	****		
	б.	Security Devices? 265.15(b)1	X	***************************************	phonogram (Milel to Allel Regue companie) or add dy hale o by conceptionings	An overlanding the state of the
	7.	Operating and Structural Devices? 265.15(b)1	NO. OF CO. OF CO. OF CO.	e Berthill a makkabay akayaya <u>a makayay</u> y	NOT AREJE	
	8.	Inspection Log? 265.15(d)		No. of the state o	TAY From Congress	HAS A

Form 1 - Page 3

		Yes	No	Not Inspected	See Remark Number
(E)_	Do Personnel Training Records Include: 265.16(d) 1. Job Titles?  La) Job Description 2. Description of Training?	•		* ************************************	1
	3. Records of Training?	<del>(                                    </del>	<del></del>	en en propiet de la companya de la c	All September 18 September 19 Sep
<b>(</b> F)	Is Personnel Training Completes within the Required Time Frame  4. Within the Required Time Frame  4. Within the Required Time Frame  4. Within the Required Time Frame  5. Complete Waster Completes  6. Incompatible Waster Addressed?  6. In Special Handling?  6. No Smoking Signs?  6. Separation and	? _ >-	Section of one	o C je Ve is	
(A)	Maintenance and Operation	DNESS AND	PREVENTION - 2	?65 Subpart C	•
	<pre>I. Is there any evidence of fir Explosion, or release of hazardous waste or hazardous waste constituent? 265.31</pre>		<u> </u>		
B)	Does the Facility have the Following Equipment: 265.32  1. Alarm System? 265.32(a)  2. Telephone or 2-Way Radios? 265.32(b)  3. Portable fire extinguishers, fire control, spill control equipment and decontaminatio equipment? 265.32(c)		FOR SACT	Market and the same and the sam	7
	265.32(c) Indicate the volume of water an 265.32(d) Units: STANDAPD	Fue 11	YNPAUT 11)	r fire control;	Acility

	***		Yes	No	Not Inspected	See Remark Number
	3.	Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	·	X	THIS INFORMATION O BE ON UPDAGE	i i
· •	4.	265.52(d) A list of an emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? 265.52(e)	••	X		
	5.	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s)		•	:	<u>.</u> ·
٠		to be used to begin evacuation, evacuation routes, and alternate evacuation routes:)  265.52(f)	χ	* .		
(B)	Ava	copies of Contingency Plan ilable at Site and local Emergency anizations?		X	COPIES ANA	i ittic
1-1	Eme	265.53 rgency Coordinator 265.55	*			e de la companya de l
	1.	Is the facility Emergency Coordinator identified?		Annan and the Alberta Annan and the Alberta Annan and the Alberta Annan and the Alberta Anna		The special and the second section of the sectio
	2.	Is Coordinator Familiar with all aspects of site operation and emergency procedures?	<u>X</u>	* Washing of the same of the s	700,000	
	¸3.·	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	Х.			
(D)	Eme	rgency Procedures		•		
	at Coo	an Emergency Situation has occurred this facility; has the Emergency rdinator followed the Emergency cedures listed in 256.56?	gyndyggg glynn gyfalin i handydd an	, Advances.	MOT APPLICALL	C 3 1
	•				•	

ē			Yes	No	Not Inspected	See Remark Number
(C)	Emerg 265.	ing and Maintenance of gency Equipment: .33 Recordkeeping required under 265.19 Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment?	5(b)1			- to day Willy 4 years at
	1	Is Emergency Equipment Maintained in Operable Conditions?	<u>×</u> .			
(D)	Imme	Owner Operator Provided diate Access to Internal ms (if needed)?	X	Quadrida visionia suscessi	Skormalin die Wilde Stepun (in wester) der Gerichte der	Company of the Compan
(E)	Is t	here Adequate Aisle Space Unobstructed Movement?	X	3-4FT (	2150 A ABUS	galang dan mayong di kalandang dan sajar dan dan sajar dan sa
(F)	Auth	Arrangements with Local orities Included in Operating Record?	<u> </u>		· · · · · · · · · · · · · · · · · · ·	
	•	V . CONTINGENCY PLAN AND	) EMERGENC	Y PROCEDUR	ES - 265 Subpart	. D
<b>(*)</b>		the Contingency Plan Contain the owing Information:		•		
		The actions facility personnel must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)	×		S OF DATE D	
	<u>,</u> ∤	Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	<u> </u>			
						•

16.16124 MANIFEST SYSTEM, RECORDREEPING, AND REPORTING -265 Subpart E Yes No Not See Remark Inspected Number (4) Use of Manifest Systim Does the facility follow the procedures listed in §265.71 for processing each Manifest? 2. Are records of past shipments APPLUALLE retained for 3 years? 10 265.71(5) (B) Does the owner or operator meet requirements regarding Manifest /( APPLICABLE Discrepancies? 265.72 (C) Operating Record Does the facility mal hain an operating record at the site as required in §265.73? (D) Availability, Retention and Disposition of Records -Are all records available at the site for inspection as required in §265.74? Appx 1:33252 VII . CLOSURE AND POST CLOSURE - 265 Subpart G and H NOT APPLICABLE (A) Closure and Post Closure Closure Plan Available for Inspection by May 19, 1981? 265.112(a) Has this plan been submitted to the Regional Administrator? 265.112(c) Has Closure begun? 265.112(c) Is closure cost estimate available by May 19, 1981? 265.142 (B) Post Closure Care and Use of Property

- Has the Owner Operator supplied a Post

Closure Monitoring Plan (by May 19, 1981)?

265.117

Form 1 - Page 7

### EPA IDENTIFICATION NUMBER 262.12

## RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS Form 2 - Generator Inspection 262

#### I. General Information:

(A)	Installatio	n Name:	PARLER	730,1510	in . CXYMS	FAC INI	SISTER S	
(B)	Street:	32100	STEPHANON	Huy-	anne de la companya de la companya de ser de ser de la companya de			- <del></del>
(C)	City:	RoyAL OI	i ₂ (D)	State: _	Mallona	(E)	Zip Code: 49	071
(F)	Phone:	583-730	()	(G) Cou	inty: <u>OAR</u>	in sets		
•			•	•				
(H)	Operator: _	7.48	rea Di	VISion	4			
(1)	Street:	Salar	370046	NSO, 1 1/1	1211.	<u> </u>		
		PAM.						071
(M)	Phone:	5y3-	e 7, 00	_(N) Cour	nty: OALLA	47	a a second of the second of th	
(0)	Owner:	+	EOKER CH	Contral-	NO P	ASTUS		
(P)	Street:	321110 S	で生で生みにない	Huy.				
(Q)	City: 2	ZOYAL OAK	(R)	State:	MICHIGANI	(\$)	Zip Code: 👱	Po 7
		583-93						
•	•		•		Munici		•	
(V)	Type of Ow	nership:	State	9	County		TITAGE	
(K)	Date of In	spection: $\underline{\sigma}3$	110.84	Time of	Inspection (	From) <u>/o</u>	174 (To) 1	M ¹
	Weather Co	nditions:	áyete A	ist, No	PTH WINDS	, COUN.		ngana nganganan ngana

(Y) Person(s) Interviewed	Title	Telephone
COCORGE PRYCE	TELGNUAL SERVET MIR	465-4360
ARTHUR Keniger	ATTERNEY	1583 1300
(Z) Inspection Parlicipants	Title	Telephone
Kevin L. Talliver	MAD . TAKE HIERE	(312) CCC-27
Suc Negatori	WOOD SIGNATURE	(3.1) 374-96
		•
	•	
•		
1 OTHER TYPE	OF HAZARDOUS WASTE ACTIVITY	. •
1 OTHER TYPE	OF HAZARDOUS WASTE ACTIVITY	• •
1 OTHER TYPE  (A) Transporter (Form 3)	OF HAZARDOUS WASTE ACTIVITY  (B) Chemical, Facility Biological	Physical and Treatment (Form 4)
•	• .	•
(A) Transporter (Form 3)	(B) <u>&gt;</u> Chemical, F Biological	Form 6)
(A) Transporter (Form 3)  (C)	(B) Chemical, F Biological (D) Landfill (F	Form 6)
(A) Transporter (Form 3)  (C)	(B) Chemical, F Biological (D) Landfill (F	Form 6)
(A) Transporter (Form 3)  (C)	(B) Chemical, F Biological (D) Landfill (F	Form 6)

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

### III. MANIFEST

		Yes	No	Not Inspected	See Remark Number
• )	Are copies of the Manifest available?	· <u>X</u>	allestings of the property and the contract of		Andreas and a second
₿)	262.23(a)3 Does the Manifest contain the following information:		THERE IS THE RES		trent the
	<pre>1. Manifest d</pre>	×	INTERNATION	1 - XX - X 1/2 - X 1/4 - X 1/4	IN THOUGH.
	Name, mailing address, telephone number, and EPA ID Number of Generator?	Spinissen and spinished and an additional		The same of the sa	
	262.21(a)2 3. Name and EPA ID Number of Transporter(s)? 262.21(a)3	Market and the second		Segge-April and Selection of the Assessment Selection (Selection Selection S	den may an home grade district of the second
	4. Nume, Address, and EPA ID Number of Designated permitted facility and alternate facility?		n er-erietas salakon kalkonya	Manufacture de Affair communication page	Br-Malantin de Paris Politica partir de la companio.
•	<pre>5. 262.21(a)4 5. The description of the waste(s)      (DOT shipping name, DOT hazard class      DOT identification number)?</pre>		270		
	262.21(a)5 DOT information in CFR 49 6. The total quantity of waste(s) and the type and number of containers loaded? 262.21(a)6	1/2.101	, 1/2.202 and 1	72.203	
:	7. Required Certification? 262.21(b)	A CONTRACTOR OF THE PERSON OF	Фотний гористия годинатия са	bronderweicht all massrinnehm relaisernis-menns meis B	manufacture of the state of the
	8. Required Signatures?			وفيون والدارسة الدائد الكاف الكاف الكاف الكاف الإنجاب الورسيون وال يونونا	**************************************
(C)	262.23(a)1  Does the Owner or Operator Submit		das These.		IAN CAUSE
	Exception Reports when Needed? 262.42	**************************************	THEREON THEY	711572	hangers vin annual content of the co
			•		•
	IV. PRE-TRANSP	ORT REQU	IREMENTS - 262	Subpart C	
	- NOT APFT	KABLE	AS YET-		
(A)	Is Generator Packaging waste in accordance with DOT Regulations? 262.30 49 CFR Parts 173.178 and 179	- Control of the Cont	tari termenya jelentika da mangalanga		(3
(B)	Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials?				a at
(C)	262.31 49 CFR Part 172  If required, are placards available to transporter?	Elita String and Artist String			
	262.33 49 CFR Part 172 Subpart F				

ጣ) Pre-ship	ment Accumi	ılat	ion:
-------------	-------------	------	------

1.	Are containers marked with start of accumulation date?	×
	262.34(a)	
2.	Are the containers of hazardous	
	waste removed from installation	
	before thy can accumulate for	
	more than 90 days?	X
_		e storage or disposal facility 262.34(b)
3.	Are wastes stored in containers	
	managed in accordance with 40 CFR	
	Part 265.174 and 265.176 (weekly inspections of containers, containers	
	holding ignitable or reactive wastes	T ray
	located at least 15 meters (50 Feet)	THE MERKY HUSPY CTIONS
•	from facility's property line?	X HAVE NOT YET STAKTED.
	· · · · · · · · · · · · · · · · · · ·	
4.	Are wastes stored in tanks managed	STORAGE IS ONLY IN DECIMS
	according to the following:	- NOT AFTERNABLE -
	a. Are tanks used to store only those	
	wastes which will not cause corrosion	
•	leakage or premature failure of the	14
	tank? 265.192(b)	Seminaria de description de la constitución de la c
•	b. Do uncovered tanks have at least	
	60 cm (2 feet) of freeboard, or dikes	•
	or other containment structures?	
•	· 265.192(c)	
	c. Do continuous feed systems have	
	a waste-feed cutoff?	
•	265.192(d)	
*	d. Are required daily and weekly	•
	inspections done?	Separate State Control of the C
	265.194	
	e. Are reactive & ignitable wastes	
	<pre>in tanks protected or rendered non- reactive or non-ignitable? (If waste</pre>	
	is rendered non-reactive or non-	
	ignitable, see treatment	
	requirements?	
	265.198, 265.17	Bargarangangan da garanda galak barangan baranga
	f. Are incompatible wastes stored	
	in separate tanks? (If not, the	
	provisions of 40 CFR <u>§265.17</u> (b)	
	apply) 265.199	
	265.199	

### V. GENERAL FACILITY STANDARDS - 262.34(a)5, 265.16, 265 Subparts C and D

If generator is also SD, omit section V

			Yes	No	Not Inspected	See Remark Number
٠.		Personnel training mecords				
		clude: 5.16				į.
	l.	Job Titles?	Marketing and proper right little color and place dright.			
	2.	265.16(d)1 Description of Training?				
		265.16(d)3	* <del>Jan an art and the state of the state</del>	Maria de la companya	**************************************	***************************************
	3.	Records of maining? 265.16(d)4		War di - quid-fond la de la quelle de la que	State with the state of the sta	**************************************
		Is Personnel Training Completed within the Requried Time Frame?	ethers, by health of the state	The state of the s	Many an electric street, and the same	
В.	Pro	epardness and Prevention 265 Subpart C	. •		٠,	,
	1.	Maintenance and Operation of Facility:				•
	•	a. Is there any evidence of fire, explosion, or release of		·		
		hazardous waste or hazardous waste constituent?	Aft highs, als innoventure corner processed			
	2.	265.31 Does the Facility have the following equipment?	4.			• •
		a. Alarm system? 265.32(a)	diameter per select access	THE SHALL MAKE THE PROPERTY AND	Was man annual a	*
		b. Telephone or 2-Way Radios? 265.32(b)	All plays and confidence of the first continues of the first continu	de anti-construction of the same		Britishin Milliam oping and an analysis of the
		c. Portable fire extinguishers, fire control, spill control				
		<pre>equipment and decontamination equipment?</pre>		•		
		265.32(c) Indicate the volume of water and/or 265.32(d)	foam availabl	e for fire	control	We distribute the second se
	•	Hadaa.	and the state of t		•	
			and white fields in the sea have an are displayed made to determine the management of		The state of the s	
	3.	Testing and Maintenance of Emergency Equipment:	•	•		,
		a. Has the Owner or Operator established testing and				
	•	Maintenance Procedures  for Emergency Equipment 265.33	* Markensyngenesyngenesyn	All the second of the second o		
		<pre>b. Is emergency equipment     Maintained in Operable     Condition?</pre>	,			•
		265.33	Character and the second secon	STEPHENE COMMENTS AND SALVEST	**************************************	Striction and Probabilities all resources and relative to the con-

· · · · · · · · · · · · · · · · · · ·		res	···	i no	spected	Soe Remark Number
	Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?					l .
5.	265.34(a) Is there adequate Aisle Space for unobstructed Movement?		•	* ~ · · · ·		The second secon
6.	265.35 Are arrangements with local authorities included in the operating record?  265.37	derminante de la companya del companya de la companya del companya de la companya	المادالة المادان و سويسسونية	Parales		
	ontingency Plan and Emergency ocedure					
1.	Does the contingency plan contain the following:					٠
•	a. The actions facility personnel must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he neonly to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)					
	b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuants §265.37?	nt		E-man		
	c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator. 265.52(d)		· ·			
	d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities? 265.52(e)	de.	· ·	- Things		No the Language Control of the Contr
	e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.	y				
	265.52(f)	Agglinder von Affren (vil für Freihendungsbegeringung	The second secon	Amoun k		

			·	•	4 2	14.61 10 1
	· ·	. •	Yes	No	Not Inspected	See Remark Number
2.	Are copies of the available at site Emergency Organiz 265.53	and local	g Bildhadh lahdaana			
3.		ator				· cicade
	a. Is the Facili Coordinator 1			**************************************	Arthurseld annual statement statement	
		or Familiar with of site operation Procedures?	Section of the sectio	Salatinistic Shribumum		
		gency Coordinator ority to carry out ocy Plan?	•			
4.	Emergency Procedu	res				
·•						
٠				The Park of The Control of Manager	**************************************	Marie Barte Breside Million (1964), Marie (1964), Garce (1964)
		VI. F	RECORDKEEPIN	G .	•	•
· E	are Manifests, Annual exception Reports, a lesults and Analyses of least three years 265.71(a)5	nd All Test Retained for	SANS-African Francis Village Age	NOT ACR	MARIE AS YET	1,15
•	•	VII. INTERN	MATIONAL SHI	DMENTS		
		6.54e 11/15 [V.).	ATTOWAL SAT	· MENTS		
E	as the Installation xported Hazardous W 262.50		Mart 400-day any manager	<u> </u>	Market and the state of the sta	Bassan namang ngangkalalan namay ngan-an-an-an-an-
	(If A was ans	wered Yes, then com	nplete one o	r both of t	he following)	
1.	Exporting Hazardo has a generator:	us waste,				•
	a. Notified the in writing?	Administrator	Elizabeta an entro a trada singular	Sidents reason our enter enterers	<b>21</b> 44	
	foreign consi delivery of t foreign count	Signature of the gnee confirming he waste(s) in the ry?				• .
	<b>262.</b> 50(b)2		All consistent the second seco	Bresier versieren, en versiere	Form 2 -	Page 7

		Yes	No	Not Inspected	See Remark Number
,	•				
	262.50(b)3		gi-dd:		1
2.	Importing Hazardous Waste, has the generator: 262.50(d) a. Met the monifest requirements?  VIII PREPA  KOVIN L. TOLLIVER  E. AIR CRUALTY ENGINEERS  Number: (3.13) GCG-2700				
	urri paca				
	VIII PREPA	ARER INFO	RMATIUN		•
ame: _	Kerin L. Tolliver				
itle:	AIR QUALITY ENGINEER			•	
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MARK	S:	·		•	
		,	,		
•	•				;
					-
					· ·
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PATE CO 76 76 12 4-EPA IDENTIFICATION NUMBER 263.11(a)

## RCR* INSPECTION REPORT - INTERIM STATUS STANDARDS Form 3 - Transporter Inspection (263)

#### I. General Information:

(A)	Transporter Name:		
(B)	Street:		
(C)	City:	(D) State:	(E) Zip Code:
(F)	Phone:	(G) County:	;
(H)	Operator:		
(i)	Street:		
<b>(</b> J).	City:	(K) State:	(L) Zip Code:
		(N) County:	
			•
(0)	Owner:		
(P)	Street:		
(Q)	City:	(R) State:	(S) Zip Code:
<b>(T)</b>	Phone:	(U) County:	
		Federal Municipal	
(V)	Type of Ownership:		1
(W)	Date of Inspection:	Time of Inspection (From	) (To)
(X)	Weather Conditions:		
	·		

(Y) }	Person(s) Interviewed		Title		Telephone
		gy, and a gyp, ago, or many			
	·			•	
(Z)	Inspection Participants		Title		Telephone
, <b>6</b>					
_	and the state of the		designation of the second		****
	·		·		· ·
· <b>a</b>	11. OTHER	TYPE OF	HAZARDOUS WA	STE ACTIVITY	
(A)	Generator (Form 2)		(B) _	Chemical, Ph Biological T	ysical and reatment (Form 4)
(C)	Storage (Form 5)		(0)	Landfill (Fo	orm 6) .
(E)	Incineration (Form 7)	•	`(F) _	·Thermal Trea	tment (Form 7)
(B)	Comments:				
	Blader Anny St. Commission of the Commission of				
	·	<del></del>			
			The second of the second secon	, .	
	Supplemental forms (Listed in inspected. Attach all Supplemental	Parathe mental f	sis) must be orms to this	completed for eac report.	h activity
		III. R	ECORDKEEPING		. •
		Yes	No	Not Inspected	See Remark Number
(A)	Are Copies of the Completed Manifest(s) or Shipping Papers Available for Review and Retained for Three Years? 263.22(a)	(s)			

		· · · · · · · · · · · · · · · · · · ·	Yes	No	Not Inspected	See Remar Number
	4			.•		•
	Does the Transporter Rec Manifest the Date the Wa 263.20(f)1	5.11 3.191 915 5.11 4				· }
₿.	Are Completed Manifest(s	) on file!		American Service Control of the Cont	**	
	<b>263.22(a)</b> and 263.20(f)2	٧.	MISCELLANEOUS	. •	•	
		· · · · · · · · · · · · · · · · · · ·			•	
A.	Does Transporter T	ort				
В.	263.10(c)1 Does the Transporter Mix Hazardous Waste of D. If	erent		Inspected  ELLANEOUS  en the Transporter is also a Generations.		
•	DOT Shipping Description by Placing them into a Container?	ns			and the second s	din .
•	263.10(c)2	•			in also a Conor	ator and
- A.	Must comply with the 263.10(c)	Generator	PARER INFORMA			
	Title:	-	**			
۰ در ۲	Phone No.:					and the second
••		·		<b>4</b> .		
Re	emarks:					
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eren.				•		
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## RCRA INSP JON REPORT - INTERIM STATUS 3 MBARDS TREATMENT, STORAGE, AND DISPOSAL FACILITIES Form 4 - Chemical, Physical and Biological Treatment/Land Treatment 265 - Subpart Q

#### 1. General Information

<b>(</b> A)	Facility Name:	PARKER DIVISIONA, CANALITAL LADESTICS	
(B)	Street:	Balco Stophenson Huy.	_
(C)	City:	ROYAL OAK (D) State: MI HECAND (E) Zip Code 48071	
(F)	Phone:	583-9300 (G) County: OAKLAND	

#### II. Chemical, Physical and Biological Treatment (Subpart Q)

		265	purt (	₹'	
		Yes	No	Not Inspected	See Remark Number
1.	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401(b)	X		•	
2.	Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)? 265.401(c)	Χ			
	Has the owner or operator addressed the waste analysis requirements of 265.402? and 265.13	•		NOT APPEA	48cE 150
4.	Are inspection procedures followed according to 265.403?	X			
5.	Are the special requirements fulfilled for ignitable or reactive wastes?	Υ.	N:	PEROTIVE	11757.5 CONFESSES
6.	Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406		X		77

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ment is a reliable to the second

#### , III. Land Treatment (Subpart M) 265

		Yes	No	Not Inspected	See Remark Number
1.	<pre>Is hazardous waste capable of biological or chemical degradation? 265.272(a)</pre>				İ
2.	Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)? 265.272(b&c)				
3.	Is waste analysis according to 265.273? and 265.13				
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 235.276?		·		
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278(a)				
6.	Does the unsaturated zone monitoring plan address the minimum information specified in 265.278(b and c)?	re - p.s sand de garando - p.s.			•
7.	Are records kept regarding application dates and rates, quantities, and locatio of all hazardous waste placed in the facility? 265.279	n 			
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? 265.281				
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies.) 265.282				

TPA IDENTIFICATION NUMBER

# RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS 265 - Subparts I,J,K, and L . General Information

Facility Name: PARKER DIVICION - OXYMETIL	11/1	00571	16:3	
Street: 32100 Stephanton Hay		· · · · · · · · · · · · · · · · · · ·		- hattan - was a transportation a sense.
City: Royae ONK. (D) State: Michael	Garage Contract	_ (E)	ZIP Code	45071
) Date of Inspection: 03-11-81				
	-	·	• "	•
II. Storage Facility Standard	is (Par	rt 265	)	•
. Facilities which store containers of hazardous waste (Sub	part :	I) 265		
	YES	NO	NOT IN- SPECTED	REMARK #
1. Are containers in good condition? 265.171	/			
2. Are containers compatible with waste in them? 265.172	1 1			
3. Are containers stored closed? 265.173(a)	<u> 1 x </u>			
4. Are containers managed to prevent leaks? 265.173(b)	7-			
5. Are containers inspected weekly for leaks and defects? (AND REGRACA W LOGS?) 265.174	X			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	X.			
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	. 177(a)	)		
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?  A 265.177(c)		X	NALLO 1	AP.C.E
3. Facilities which store hazardous waste in tanks (Subpart	t J)	NOT	AFRICA	HISCE.
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192(b)				
2. Do uncovered tanks have at least 60 cm (2 feec) of freeboard, or dikes or other containment structures? 265.192(c)				
Continued on next page			Form 5 -	Page 1

				1	: 1	,
Lo continuous feed systems have a waste-feed cutoff?	265.19	2 (3.80				
the before the tanks are used	265.19	3(a)			ar talah samba da samban sa sa sa sa sa sa sa sa sa sa sa sa sa	
Fre required daily and weekly inspections done? 265.19	4				· · · · · · · · · · · · · · · · · · ·	
Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.198					•	
. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) 26	55 199				and the second second second second second second second second second second second second second second seco	1
Facilities which store hazardous waste in surface impou	ndments	(Sub	part K)	265		
. Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222					and the second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second s	
2. Do earthen dikes have protective cover? 265.223			<u> </u>			
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?	? 265.	225(a)				,,
4. Is the freeboard level inspected at least daily? 265		1				
<ol> <li>Are the dikes inspected weekly for evidence of leaks or deterioration? 265.226(a)2</li> </ol>			<del></del>			
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impound ment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.299(a)1	e I-					,
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230				<b>,</b>		
. Facilities which store hazardous waste in waste piles	(Subpa	irt L)	265	and the last way of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same o		
1. Are waste piles covered or protected from the wind?			-			.,
<ol> <li>Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252</li> </ol>						
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981)	265.25	3			•	
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile (If waste is rendered non-reactive or non-ignitable see treatment requirements.) 265.256(a)1	? e,					

. 4.				SPECTED	WE WILL T
5.	Are piles of reactive or ign. ble waste protected? 265.256(a)2				
	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.	257 <b>(</b> a	)		
7.	Are piles of incompatible waste protected by barriers or distance from other waste? 265.257(b)				

MID 657676129

		'es	No	Not Inspected	See Remari Number
C. (	Closure and Post-Closure				•
1	Is the Closure Plan available for inspection by 5-19-81? 265.112(a)				O
;	2. Has this plan been submitted to the Regional Administrator? 265.112(c)	<del></del>	<b>9</b> ,444.44.5		
	3. Has Closure begun? 265.112(c)		<u> </u>		Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Company of the Compan
	4. Is Closure cost estimate available by 5-19-81?	, , ,	and the second	ay or a fact of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of th	****
	265.142(a)				* *
D.	Special requirements for ignitable or reactive waste				
	Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? 265.312				
	(If waste is rendered non-reactive or non-ignitable see treatment requirements)		-	•	•
	If not, the provisions of 40 CFR <u>265.17(b)</u> apply.	***************************************	Appendix on the second		<del> </del>
					•
E.	Special requirements for Incompatible Wastes.		•	•	
	Does the owner or operator dispose of incompatible wastes in separate cells?				
	265.313  If not, the provisions of 40 CFR 265.17(b) apply.	فسنحسربوندي	,		and the second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second s
F.	Special Requirements for liquid waste (effective 11-19-81)				
	1. Are bulk or non-containerized liquids placed in the landfill?	Alberta September September 1988	*		The state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the s
•	265.314(a)  2. Does the landfill have a chemically and physically resistant liner system? 265.314(a)1				· ·

### RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS FORM 6 - LANDFILL INSPECTIONS

265 - Subpart N

#### 1. General Information

(A) Fac	ility Name:			والمعادمات مستون المعادر والمعادر	· · · · · · · · · · · · · · · · · · ·		
(B) Str	eet:		· ·	والمراجعة والمراجعة والمراجعة والمراجعة والمراجعة والمراجعة والمراجعة والمراجعة والمراجعة والمراجعة والمراجعة			
(C) City	y :	(D) State:		(E) Zip Code			
(F) Dat	e of Inspection:					;	
٠	11.	Landfills	Yes	No	Not Inspected	See Remar Number	
(A) Gen Doe	eral Operating Requiremen s the facility provide th	ts - e following:					
*1.	Diversion of run-on away portions of the fill? 2		\$14.40 mm m m	-		mindriggspyrate belande at the set the set of the set.	
*2	Collection of run-off fr portions of the fill? 2	om active 65.302(b)	<del></del>	Surveyed in 2018 - Mar	Water and with a first transport of the spirit of the spir	galantagan merusakkuntkanga dakkangan d	
*3.	Is collected run-off tr	eated? 65.302(b)	-	West (Married In Sec. Sec. and	. The same production and	والمرابة والمستحدد والمستوانية والمراجد والمستوار والمناوع والمراجد والمستوار والمناوع والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمراجد والمرا	
4.	Control of wind dispersal		<u>, , , , , , , , , , , , , , , , , , , </u>	-	·	is demonstrative to the post of the proper temporal and makes the province come	
<b>(</b> * E	ffective 11-19-81)						
(B) Sur Doe	rveying and Recordkeeping es the Operating Record I	rclude:					
1.	A map showing the exact and dimensions of each (265.309(a)		Magazapan and and an other states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the states of the sta	75. <del></del>			
2.	The contents of each ce location of each hazard type within each cell? 265.309(b)		<b>Epoge-manysh</b>	ng , <del>dingulagan</del> a		e same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and a same and	

	Yes	No	Not Inspected	See Remar- Number
<ol> <li>Does the landfill have a functional leachate collection system?</li> <li>265.314(a)1</li> </ol>	damas salah persentan	·	Arrayadayirda hadda rayarida Abilad BAND	•
4. Are free liquids stabilized prior to or immediately after placement in the landfill? 265.314(a)2	Walter Commonweal	<del>D-Marine a speciel</del>		
Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?  265.315(a)	• 48			

G.